

EXHIBIT M

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Case No.

NOTICE OF REMOVAL

PACIFIC WATER TECHNOLOGY, LLC,
SPRUCE WATERS INVESTMENTS, LLC,
INDIANA WATER TECHNOLOGY, LLC,
AR WATER SUPPLY, LLC, BLC WATER
COMPANY, LLC, GRANITE STREET
VENTURES, LLC, RUMSON WELLNESS,
LLC, BROWN FAMILY ENTERPRISES,
LLC, KMANDY INVESTMENTS, L.L.C.,
EVER UPWARD, INC., SUN A WY, LLC,
SIRIPI WST, LLC, LIVINGWATER
STATION, LLC, GRAYFIN VENTURES,
LLC, PRASITI WATER INVESTMENTS,
LLC, JBF CONSULTING SERVICES, LLC,
COCO AQUA, LLC, Q & V LLC,
WATERSTATION TECHNOLOGY OF
ROCKVILLE, ARRAVEND, LLC,
FLATLANDS EQUIPMENT, LLC, C&C
INVESTMENT HOLDINGS, LLC, GREAT
OAK WATER, LIMITED LIABILITY
COMPANY, WV WATER TECH, LLC,
KDAWG CRYPTO, LLC, CULMINATE
WATER TECHNOLOGY, LLC, CHUGIT,
LLC, CHAURISHI RETAIL ENTERPRISES,
LLC, PROGRESSIVE PARTNERS, LLC, 210
SA HOLDING, LLC, WST UTAH LLC,
V2S2, LLC, CYBORG HOLDINGS, LLC,
ASH VENDING, LLC, ADVENTURE DONE
RIGHT, LLC, BIG BOY TOOLS LLC,
ROMAN JAROSIEWICZ, ABBY WYATT
GROUP, INC., AIDEN WATERWORKS,
LLC, HOREB WATER SOLUTIONS, LLC,
SILVER OAK H2O, LLC, NS SQ ECO
WATERS, LLC, JK SEVEN LLC, JEFFREY
BROOKE, OED PROPERTIES LLC, JLE
ENTERPRISES, LLC, BE OF SERVICE,
LLC, ETANIA, LLC, NIRA ENTERPRISES,
LLC, FACTS PROPERTY SERVICES, LLC,

NOTICE OF REMOVAL - 1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WASHINGTON 98111-9402
206.223.7000 FAX: 206.223.7107

1 IMLSUNSHINE, LLC, REDWATERS, LLC,
 2 STARTER HOLDINGS, LLC, HELMUT
 3 GIEWAT, MAY AUERBACH, ROYAL
 4 RESERVOIRS, LLC, AQUALUX WATER
 5 LLC, RCWSTECH1157, LLC,
 6 COLEWSTECH, LLC, MAJI 8377, LLC,
 7 OAKS WATERSTATION TECH, LLC, SDB
 8 H2O, LLC, WST, LLC, HALF FULL
 9 VENDING, LLC, RDWSTECH3594, LLC,
 10 ROSE TRAIL VENTURES, LLC, AND
 11 ROSE TRAIL VENTURES 2, LLC, PRAVIN
 12 THAKKAR JR, KWANSOO LEE, DDS,
 13 TOM ANDERSON, ABBEY ANDERSON,
 14 BRIAN CHU, DDS, LARINA CHU, DAVID
 15 SCHROEDER, SARAH SCHROEDER,
 16 REGINALD FRANKLIN, ANGEL
 17 FRANKLIN, DYLAN ROSS, TAYLOR
 18 ROSS, CODY BISHOP, DAVID BROWN,
 19 KARTHIKA MANDYAM, DAVID
 20 BERANEK, SUSAN PINKERTON,
 21 RADHIKA SIRIPIREDDY, KARL
 22 SCHOENLEBER, JAMES SARTAIN,
 23 NIRUPA KESKAR, JOHN FLACK, TRUNG
 24 NGUYEN, LI LIANG, TAN QUAN
 25 NGUYEN, ASHOKA SHEANH, MATHEW
 26 FELLOWS, CHARLES COGGINS,
 27 THOMAS WAWERSICH, JASON
 BLOUGH, MICHELE BLOUGH, KAREN
 LAVIN, PADMA KANDIKONDA, PAVAN
 KANDIKONDA, JAMES VILT II, BASANT
 KUMAR, RADHIKA KAMALLA, MARC
 HILDEBRAND, DEBRA HILDEBRAND,
 MERRILL STODDARD, DANIELLE
 STODDARD, VENKITA SHARMA,
 TIMOTHY DAILEY, ROBERT HOERY,
 STEFANI HOERY, SEAN DONE, ANNA
 DONE, STERLING DAVIS, MARK
 FLEMING, STACEY FLEMING, BO YANG,
 STEVEN WELLS, DUSTIN BRAEGER,
 NAVANEETH KUMAR, WILLIAM WHITE,
 JEANNETTE WHITE, JEFFREY BROOKE,
 JOSHUA OED, JAMES ESTES, ADRIA
 ESTES, MICHAEL BAILEY, KARTHIGA
 JAYARAM, KARTHIKEYAN
 RAMPRASATH, ARCHAN TLKOTI,
 AASHISH PAREKH, JACOB
 LETOURNEAU, KARLA LETOURNEAU,
 KONDA REDDY GADI, SREELAKSHMI
 SIRIPURAM, JOSHUA LEYKAM, PAIGE
 LEYKAM, HELMUT GIEWAT, DEREN
 FLESHER, DDS, GARY YOUNG, HEIDI
 YOUNG, RONALD COLE, DDS, JAMES
 WALKER, DDS, DUANE OKAMOTO,

NOTICE OF REMOVAL - 2

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 P.O. BOX 91302
 SEATTLE, WASHINGTON 98111-9402
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LINDA OKAMOTO, SCOTT BURAU, DDS,
BRAD BURAU, DDS, JOSH MCNARY, and
ROBERT DOST, DDS,

Plaintiffs,

v.

RYAN R. WEAR and REBECCA A. SWAIN,
CREATIVE TECHNOLOGIES, LLC d/b/a
WATERSTATION TECHNOLOGY, WST
FRANCHISE SYSTEMS LLC, WATER
STATION MANAGEMENT, LLC, KEVIN
NOONEY and ELIZABETH NOONEY, and
the marital community comprised thereof,
REFRESHING USA, LLC, SUMMIT
MANAGEMENT SERVICES, LLC, IDEAL
PROPERTY INVESTMENTS, LLC,
REFRESHING CALIFORNIA L.L.C.,
REFRESHING MONTANA, LLC,
REFRESHING MID-ATLANTIC, LLC,
REFRESHING CAROLINES, LLC,
REFRESHING GREAT LAKES, LLC,
WATERSTATION FINANCE COMPANY,
LLC, REFRESHING GEORGIA, LLC,
CREATIVE TECHNOLOGIES FLORIDA,
LLC, REFRESHING FLORIDA, LLC, 2129
ANDREA LANE LLC, 3209 VAN BUREN
LLC, ICE & WATER VENDORS, LLC,
IDEAL INDUSTRIAL PARK, LLC, IDEAL
AZ PROPERTY INVESTMENTS, LLC, K-2
ACQUISITION, LLC, EMERY
DEVELOPMENT, LLC, ARIZONA WATER
VENDORS INCORPORATED, WST AZ
PROPERTIES LLC, 1118 VIRGINIA
AVENUE LLC, 11519 SOUTH
PETROPARK LLC, TCR PLUMBING, LLC,
3422 W CLARENDON AVE LLC, 1206
HEWITT AVE LLC, WATERSTATION
TECHNOLOGY II, LLC, PISTOL, INC.,
SMOKEY POINT HOLDINGS, LLC, 602
SOUTH MEAN, LLC, 719 EDEN, LLC, 343
GROUP LLC, 4300 FOREST LLC, 70 NO
GARDEN, LLC, 204 NWW LLC,
WATERSTATION TECHVENTURE, LLC,
WATER STATION HOLDINGS LLC,
WATERSTATION TECHNOLOGY, LLC,
REFRESHING COLORADO LLC,
ARIZONA VENDORS INC., GOLDEN
STATE VENDING, LLC, REFRESHING
FLORIDA LLC, REFRESHING MIDWEST,
LLC, REFRESHING MIDWEST REAL
ESTATE, LLC, REFRESHING NEW

NOTICE OF REMOVAL - 3

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MEXICO, LLC, REFRESHING NEW ENGLAND LLC, REFRESHING TEXAS LLC, REFRESHING OKLAHOMA LLC, REFRESHING WASHINGTON, LLC, SMART SODA HOLDINGS, INC., VENDPRO, LLC d/b/a ELITEVEND, HARRISON STREET, LLC, 602 SOUTH MEADOW LLC, 8825 LLC, UNIBANK, U & I FINANCIAL CORP., SIMON BAI, STEPHANIE YOON, D. BENJAMIN LEE, PETER PARK, FIRST FED BANK, FIRST NORTHWEST BANCORP, NORMAN TONINA, CRAIG CURTIS, JENNIFER ZACCARDO, CINDY FINNIE, DANA BEHAR, MATTEW DEINES, SHERILYN ANDERSON, GABRIEL GALANDA, LYNN TERWOERDS, LARRY HOUK, NORTHWEST FINANCIAL SERVICES, LLC, and RICHARD WEAR,

Defendants.

JAMES GROUP Int., LLC,

Plaintiff,

v.

WATER STATION MANAGEMENT, LLC; CREATIVE TECHNOLOGIES, LLC; and RYAN WEAR and his marital community,

Defendants.

AXIAL TILT, LLC, a Delaware domestic limited liability company, and MOD HOLDINGS, LLC, a Delaware domestic limited liability company,

Plaintiffs,

v.

WATERSTATION, LLC, a Washington limited liability company, and RYAN WEAR, an individual,

Defendants.

JRC REAL ESTATE III, LLC, a California
limited liability company,

Plaintiff,

v.

WATER STATIONS MANAGEMENT, LLC,
a Washington limited liability company,

Defendant.

PURE WATER VENDING, LLC, a
Washington limited liability company,

Plaintiff,

v.

WATER STATION MANAGEMENT, LLC, a
Washington limited liability company; and
WST FRANCHISE SYSTEMS LLC, a
Washington limited liability company; and
RYAN WEAR, an individual,

Defendants.

EMMATOINE LLC, a Florida limited liability
company,

Plaintiff,

v.

WATER STATION MANAGEMENT, LLC, a
Washington limited liability company,

Defendants.

RHINO MANUFACTURING, INC. and
RHINO INVESTMENTS, LLC,

Plaintiffs,

v.

CREATIVE TECHNOLOGIES, LLC dba
WATER STATION TECHNOLOGY;
WATER STATION MANAGEMENT, LLC,

Defendants.

1 REX VENTURES LLC, a limited liability
2 company,

3 Plaintiff,

4 v.

5 WST FRANCHISE SYSTEM LLC, a
6 Washington limited liability company;
7 WATER STATION MANAGEMENT, LLC, a
8 Washington limited liability company; and
9 RYAN WEAR, an individual

10 Defendants.

11 DENNIS DEMIRJIAN, an individual,

12 Plaintiff,

13 v.

14 WATER STATION MANAGEMENT, LLC, a
15 Washington limited liability company;
16 CREATIVE TECHNOLOGIES, LLC, a
17 Washington limited liability company;
18 REFRESHING USA, LLC, a Washington
19 limited liability company; IDEAL
20 PROPERTY INVESTMENTS, LLC, a
21 Washington limited liability company;
22 SUMMIT MANAGEMENT SERVICES,
23 LLC, a Washington limited liability company;
24 KEVIN NOONEY, an individual; and RYAN
25 WEAR, an individual,

26 Defendants.

27 TANUSHKA WATER VENDING, LLC, a
limited liability company; and AARANA
WATER VENDING, LLC, a limited liability
company,

Plaintiffs,

v.

RYAN WEAR, an individual, and WATER
STATION MANAGEMENT, LLC, a limited
liability company in Washington,

Defendants.

WAKANDA VENTURES, LLC, a New
Jersey limited liability company,

Plaintiff,

v.

WATER STATION MANAGEMENT, LLC, a
Washington limited liability company; RYAN
WEAR, an individual,

Defendants.

PAUL MARTINCHUK,

Plaintiff,

v.

WATER STATION MANAGEMENT, LLC, a
Washington limited liability company; WST
FRANCHISE SYSTEM LLC, a Washington
limited liability company; CREATIVE
TECHNOLOGIES LLC, a Washington limited
liability company; RYAN WEAR and
REBECCA A. SWAIN, and the marital
community comprised thereof; and KEVIN
NOONEY and ELIZABETH NOONEY, and
the marital community comprised thereof,

Defendants.

TO: Clerk of Court

AND TO: The parties and their attorneys of record

Defendants First Fed Bank, First Northwest Bancorp, Norman Tonina, Craig Curtis,
Jennifer Zaccardo, Cindy Finnie, Dana Behar, Matthew Deines, Sherilyn Anderson, Gabriel
Galanda, and Lynn Terwoerds (collectively, the First Fed Defendants), hereby remove to this
Court the state-court action described below. The First Fed Defendants state the following grounds
for removal:

BACKGROUND

1. Certain plaintiffs filed their complaint in the state court on April 16, 2024. This
complaint asserted the claims of only seven plaintiffs, and it did not name the First Fed Defendants.

2. On June 20, 2024, Plaintiffs filed their first amended complaint. The amended complaint named the First Fed Defendants. It also named over 100 additional plaintiffs. A true and correct copy of the First Amended Complaint is attached hereto.

3. The First Fed Defendants were served on July 8, 2024.

4. The complaint alleges violation of the Washington State Securities Act and other state-law claims. Am. Compl.¹ ¶ 1. It alleges that plaintiffs' damages exceed \$76,267,500.

5. Plaintiffs are citizens of various states. *See* Am. Compl. ¶¶ 11–74. Defendants are also citizens of various states. *See id.* ¶¶ 75–141. Further, certain plaintiffs are citizens of states, including Indiana, Rhode Island, and Tennessee, of which no defendant is a citizen. *Compare id.* ¶¶ 13, 44, 16, 26, 35, 74, with *id.* ¶¶ 75–141.

6. On certain plaintiffs' motion, the action in which First Fed Defendants were named was consolidated with 11 other actions. True and correct copies of each of those Complaints are attached hereto. The action in which the First Fed Defendants were named was removable in its own right. It remains removable after being consolidated, and consolidation renders all 12 actions removable.

REMOVAL JURISDICTION

7. Class Action Fairness Act. Congress passed the Class Action Fairness Act (CAFA) “primarily to curb perceived abuses of the class action device.” *United Steel, Paper & Forestry, Rubber, Mfg., Energy, Allied Indus. & Serv. Workers Int’l Union, AFL-CIO, CLC v. Shell Oil Co.*, 602 F.3d 1087, 1090 (9th Cir. 2010). “CAFA provides the federal district courts with “original jurisdiction” to hear a “class action” if the class has more than 100 members, the parties are minimally diverse, and the “matter in controversy exceeds the sum or value of \$5,000,000.” *Standard Fire Ins. Co. v. Knowles*, 568 U.S. 588, 592 (2013). CAFA also provides for removal where the court would have had original jurisdiction. 28 U.S.C. § 1453(b). “[N]o antiremoval

¹ Citations to “Am. Compl.” are to the complaint naming First Fed Defendants. Complaints in the 11 consolidated actions are cited by naming the first listed plaintiff in each complaint.

presumption attends cases invoking CAFA, which Congress enacted to facilitate adjudication of certain class actions in federal court.” *Dart Cherokee Basin Operating Co., LLC v. Owens*, 574 U.S. 81, 89 (2014). Similarly, the forum state defendant rule does not apply under CAFA. *See* 28 U.S.C. § 1332(d)(4)(A)(i)(II); *see also* 28 U.S.C. § 1453(c)(1). A removing defendant may allege citizenship on information and belief. *Ehrman v. Cox Comm’cns, Inc.*, 932 F.3d 1223, 1227 (9th Cir. 2019).

8. Mass Action. This action is a deemed “class action removable” under CAFA. *See* 28 U.S.C. § 1332(d)(11)(A). This is because it is a “civil action . . . in which monetary relief claims of 100 or more persons are proposed to be tried jointly on the ground that the plaintiffs’ claims involve common questions of law or fact.” *Id.* § 1332(d)(11)(B)(1). Each plaintiff’s claims exceed \$75,000. *See* Am. Compl. ¶ 165. Each plaintiff’s claims also involve common questions of fact and common questions of law related to allegedly similar transactions with defendants.

9. Plaintiffs’ Citizenship. Citizenship of each plaintiff is alleged below. For the purposes of CAFA, “an unincorporated association shall be deemed to be a citizen of the State where it has its principal place of business and the State under whose laws it is organized.” 28 U.S.C. § 1332(d)(10). Citizenship of each plaintiff is alleged below. Plaintiffs in the action naming First Fed Defendants are citizens of Arizona, California, Colorado, Connecticut, Delaware, Florida, Illinois, Indiana, Kansas, Maryland, Michigan, Minnesota, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wyoming. The 11 consolidated actions add a plaintiff with Georgia citizenship.

10. Defendants’ Citizenship. Citizenship of each defendant is alleged below. Defendants named alongside First Fed Defendants are citizens of Arizona, California, Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Montana, New Hampshire, New Mexico, North Carolina, Ohio, Pennsylvania, Texas, Washington, Wyoming. The 11 consolidated actions do not add defendants with additional states of citizenship.

11. Minimal Diversity. The court has jurisdiction when “any member of a class of

plaintiffs is a citizen of a State different from any defendant.” 28 U.S.C. § 1332(d)(2)(A). This minimal diversity is met because plaintiffs are citizens of various states, and defendants are also citizens of various states. Further, certain plaintiffs are citizens of Indiana, Rhode Island, and Tennessee, of which no defendant is a citizen. *Compare id.* ¶¶ 13, 44, 16, 26, 35, 74, *with id.* ¶¶ 75–141.

12. Amount in Controversy. “The amount in controversy is simply an estimate of the total amount in dispute, not a prospective assessment of defendant’s liability” or a concession of liability. *Lewis v. Verizon Commc’ns, Inc.*, 627 F.3d 395, 400 (9th Cir. 2010). CAFA’s amount in controversy requirement is satisfied because the aggregate claims of the putative class members exceed \$5,000,000. 28 U.S.C. § 1332(d)(6). The amended complaint in the action naming First Fed Defendants alleges that the aggregate investments of Plaintiffs totaled over \$76,000,000, and claims that damages sustained by Plaintiffs exceed this amount. Am. Compl. ¶¶ 165–66. Thus, the amount in controversy greatly exceeds the \$5,000,000 threshold. Further, the claims of individual plaintiffs in the action in which First Fed Defendants are named exceed \$75,000. *See* Am. Compl. ¶ 165. The consolidation of 11 other actions only increases the amount in controversy.

13. Exceptions to Jurisdiction. CAFA provides certain exceptions to jurisdiction. *Serrano v. 180 Connect, Inc.*, 478 F.3d 1018, 1024 (9th Cir. 2007). “The well-established rule that the party seeking remand must prove the applicability of such exception governs with equal force in the context of CAFA as with the general removal statute.” *Id.* In any case, no such exception exists. First, there is no basis for the court to exercise discretion to decline jurisdiction because far fewer than one-third of the plaintiffs (in both the action in which First Fed Defendants are named and in all 12 actions consolidated) are Washington citizens. *See* 28 U.S.C. § 1332(d)(3). Second, and for this same reason, there is no requirement for the court to decline jurisdiction. *See id.* § 1332(d)(4). Third, none of the exceptions in 28 U.S.C. § 1453(d) apply. Each of these exceptions requires that an action “solely” involve a certain subject matter. Because the amended complaint naming First Fed Defendants does not “solely” concern the enumerated subject matter, neither the action in which First Fed Defendants is named nor the consolidated action “solely” concerns this

1 subject matter. The first § 1453(d) exception concerns securities defined as “covered securities” in
 2 15 U.S.C. § 77p(f)(3) and 15 U.S.C. § 78bb(f)(5)(E). Both these sections in turn refer to 15 U.S.C.
 3 § 77(r)(b)(1)–(2). The first component of the § 77(r)(b) definition concerns “security listed on a
 4 national stock exchange.” *Cyan, Inc. v. Beaver Cnty. Emp. ’s Ret. Fund*, 583 U.S. 416, 423 (2018);
 5 *see also See Katz v. Gerardi*, 552 F.3d 558, 562–63 (7th Cir. 2009). The second component of the
 6 § 77(r)(b) definition concerns securities “issued by an investment company that is registered, or
 7 that has filed a registration statement, under the Investment Company Act of 1940.” 15 U.S.C.
 8 § 77p(b)(2). The Investment Company Act of 1940 concerns mutual funds. *See Northstar Fin.*
 9 *Advisors, Inc. v. Schwab Investments*, 615 F.3d 1106, 1109 (“The ICA was the counterpart in the
 10 area of mutual fund regulation to the Securities Act of 1933 and the Securities Exchange Act of
 11 1934 . . .”). The amended complaint nowhere alleges that any supposed securities were listed on
 12 a national stock exchange or were issued by mutual funds or similar investment companies.
 13 Instead, it alleges that the supposed securities were unregistered. *See, e.g., Am. Compl.* ¶ 194. The
 14 case therefore does not “solely” concern securities covered by the first § 1453(d) exception. The
 15 second § 1453(d) exception concerns “the internal affairs or governance of a corporation or other
 16 form of business enterprise.” 28 U.S.C. § 1453(d)(2). The amended complaint alleges nowhere
 17 any claim related to corporate governance. It does not “solely” relate to this subject. The third
 18 § 1453(d) exception concerns “rights, duties, or obligations created by or pursuant to a security.”
 19 *Eminence Investors, L.L.L.P. v. Bank of N.Y. Mellon*, 782 F.3d 504, 506 (9th Cir. 2015). This
 20 exception does not apply. To begin, the amended complaint concerns franchise agreements and
 21 loans, neither of which are securities under the tests set out in *Securities & Exchange Commission*
 22 *v. Howey*, 328 U.S. 293 (1946), and *Reves v. Ernest & Young*, 494 U.S. 56 (1990), and therefore
 23 not securities within the meaning of 15 U.S.C. § 77b(a)(1), whose definition is referenced in
 24 § 1453(d)(3). Further, the exception does not apply to claims asserting plaintiffs’ rights as
 25 purchasers, rather than holders of supposed securities. *Eminence Inv’rs, LLLP v. Bank of N.Y.*
 26 *Mellon*, 782 F.3d 504, 508 (9th Cir. 2015). The amended complaint repeatedly alleges as a basis
 27 for its claims circumstances surrounding the offer and sale of the supposed securities. For example,

the amended complaint alleges, “Defendants made false representations and/or nondisclosures through words and/or conduct that were material to, and induced Plaintiffs’ decisions to invest as applicable.” Am. Compl. ¶ 235; *see also, e.g., id.* ¶¶ 199, 207, 215, 221, 224, 228, 235. It therefore does not “solely” relate to duties *created* by a security.

PROCEDURAL REQUIREMENTS

14. CAFA Procedures. CAFA eliminates certain procedural requirements for removal. There is no forum state defendant rule under CAFA, and no other defendant need consent to a removal under CAFA. *See* 28 U.S.C. § 1453(b).

15. Removal is timely. Plaintiffs served the First Fed Defendants on July 8, 2024. This Notice of Removal is filed within 30 days of that date. *See* 28 U.S.C. § 1446(b).

16. Venue. This Court is in the judicial district and division embracing Snohomish County, Washington, where the state-court case was brought and is pending. Thus, it is the proper district court for removal. *See* 28 U.S.C. § 1446(a).

17. Notice. Concurrently with the filing of this Notice of Removal, Defendants are giving written notice of Removal to Plaintiffs and filing a copy of this Notice of Removal with the Clerk of the Snohomish County Superior Court, pursuant to 28 U.S.C. § 1446(d).

18. Pleadings and Process. A copy of the complaint, process, and orders served upon the First Fed Defendants are attached as Attachments A, B, C, D, and E. 28 U.S.C. § 1446(a). Also attached are a certificate of service listing all counsel and pro se parties who have appeared in the action and a civil cover sheet. LCR 101(b). Attached as Attachments F, G, H, I, J, K, L, M, N, O, P, and Q are complaints in the consolidated actions, as well as a jury demand filed in one of them. No other jury demand has been filed.

19. Additional Records. True and complete copies of additional records and proceedings on file in the state court will be submitted in accordance with Local Civil Rule 101(c).

PLAINTIFFS’ CITIZENSHIP

20. Pacific Water Technology LLC is alleged to be registered in Washington and owned by a Washington resident. Am. Compl. ¶ 11. According to the Washington Secretary of

State, it is organized under the laws of Washington and has its principal office in Puyallup, Washington. On information and belief, it is a citizen of Washington.

21. Spruce Waters Investments, LLC is alleged to be registered in Florida and owned by a Florida resident. Am. Compl. ¶ 12. According to the Florida Secretary of State, it is organized under the laws of Florida and has its principal office in Naples, Florida. On information and belief, Spruce Waters Investments, LLC is a citizen of Florida.

22. Indiana Water Technology, LLC is alleged to be registered in Indiana and owned by an Indiana resident. Am. Compl. ¶ 13. According to the Indiana Secretary of State, it is organized under the laws of Indiana and has its principal office in Indianapolis, Indiana. On information and belief, it is a citizen of Indiana.

23. AR Water Supply, LLC is alleged to be registered in Texas and owned by a New York resident. Am. Compl. ¶ 14. According to the Texas Secretary of State, it is organized under the laws of Texas and has an address in Frisco, Texas. On information and belief, it is a citizen of Texas.

24. BLC Water Company, LLC is alleged to be registered in Nevada and owned by a California resident. Am. Compl. ¶ 15. According to the Nevada Secretary of State, it is organized under the laws of Nevada and has an address in Las Vegas, Nevada. On information and belief, it is a citizen of Nevada.

25. Granite Street Ventures, LLC is alleged to be registered in Rhode Island and owned by a Tennessee resident. Am. Compl. ¶ 16. According to the Rhode Island Secretary of State, it is organized under the laws of Rhode Island and has its principal office in Franklin, Tennessee. On information and belief, it is a citizen of Rhode Island and Tennessee.

26. Rumson Wellness, LLC is alleged to be registered in New Jersey and owned by a New York resident. Am. Compl. ¶ 17. Rumson Wellness is organized under the laws of New Jersey and has an address in Rumson, New Jersey.² On information and belief, it is a citizen of

² Certain secretaries of state provide a principal office address, while others provide only an

1 New Jersey.

2 27. Brown Family Enterprises, LLC is alleged to be registered in Oregon and owned
3 by an Oregon resident. Am. Compl. ¶ 18. According to the Oregon Secretary of State, it is
4 organized under the laws of Oregon and has its principal office in Salem, Oregon. On information
5 and belief, it is a citizen of Oregon.

6 28. Kmandy Investments, LLC is alleged to be registered in Texas and owned by a
7 Texas resident. Am. Compl. ¶ 19. According to the Texas Secretary of State, it is organized under
8 the laws of Texas and has an address in McKinney, Texas. On information and belief, it is a citizen
9 of Texas.

10 29. Ever Upward, Inc. is alleged to be registered in Virginia and owned by a Virginia
11 resident. Am. Compl. ¶ 20. It is incorporated in Virginia and, according to the Virginia Secretary
12 of State, has its principal office in Las Vegas, Nevada. On information and belief, it is a citizen of
13 Virginia and Nevada.

14 30. Sun A WY, LLC is alleged to be registered in Wyoming and owned by a Florida
15 resident. Am. Compl. ¶ 21. According to the Wyoming Secretary of State, it is organized under
16 the laws of Wyoming and has its principal office in Cape Coral, Florida. On information and belief,
17 it is a citizen of Wyoming and Florida.

18 31. Siripi WST, LLC is alleged to be registered in Texas and owned by a Texas
19 resident. Am. Compl. ¶ 22. According to the Texas Secretary of State, it is organized under the
20 laws of Texas and has an office in Frisco, Texas. On information and belief, it is a citizen of Texas.

21 32. LivingWater Station, LLC is alleged to be registered in South Carolina and owned
22 by a South Carolina resident. Am. Compl. ¶ 23. According to the South Carolina Secretary of
23 State, it is organized under the laws of South Carolina. According to other research, it has an
24 address in Saint Helena Island, South Carolina. On information and belief, it is a citizen of South
25 Carolina.

26 _____
27 address for an office, without indicating whether it is the principal office.

1 33. Grayfin Ventures LLC is alleged to be registered in Texas and owned by a Texas
2 resident. Am. Compl. ¶ 24. According to the Texas Secretary of State, it is organized under the
3 laws of Texas and it has an address in Lewisville, Texas. On information and belief, it is a citizen
4 of Texas.

5 34. Prasiti Water Investments, LLC is alleged to be owned by a Texas resident. Am.
6 Compl. ¶ 25. The amended complaint does not allege where it is registered. According to the Texas
7 Secretary of State, it is organized under the laws of Texas and it has an address in McKinney,
8 Texas. On information and belief, it is a citizen of Texas.

9 35. JBF Consulting Services, LLC is alleged to be registered in Tennessee and owned
10 by a Tennessee resident. Am. Compl. ¶ 26. According to the Tennessee Secretary of State, it is
11 organized under the laws of Tennessee and it has its principal office in Germantown, Tennessee.
12 On information and belief, it is a citizen of Tennessee.

13 36. Coco Aqua, LLC is alleged to be registered in Texas and owned by a Texas resident.
14 Am. Compl. ¶ 27. According to the Texas Secretary of State, it is organized under the laws of
15 Texas and has an address in Sugarland, Texas. On information and belief, it is a citizen of Texas.

16 37. Q & V LLC, Waterstation Technology of Rockville is alleged to be registered in
17 Maryland and owned by a Maryland resident. Am. Compl. ¶ 66. According to the Maryland
18 Secretary of State, it is organized under the laws of Maryland and it has its principal office in
19 Rockville, Maryland. On information and belief, it is a citizen of Maryland.

20 38. Arravend, LLC is alleged to be registered in Wyoming and owned by a Virginia
21 resident. Am. Compl. ¶ 28. According to the Wyoming Secretary of State, it is organized under
22 the laws of Wyoming and it has its principal office in Sheridan, Wyoming. On information and
23 belief, it is a citizen of Wyoming.

24 39. Flatlands Equipment, LLC is alleged to be registered in Kansas and owned by a
25 Kansas resident. Am. Compl. ¶ 29. According to the Kansas Secretary of State, it is organized
26 under the laws of Kansas and has its principal office in Wichita, Kansas. On information and belief,
27 it is a citizen of Kansas.

1 40. C&C Investment Holdings, LLC is alleged to be registered in North Carolina and
2 owned by a North Carolina resident. Am. Compl. ¶ 30. According to the North Carolina Secretary
3 of State, it is organized under the laws of North Carolina and it has its principal office in Raleigh,
4 North Carolina. On information and belief, it is a citizen of North Carolina.

5 41. Great Oak Water, Limited Liability Company is alleged to be registered in Texas
6 and owned by a Texas resident. Am. Compl. ¶ 31. According to the Texas Secretary of State, it is
7 organized under the laws of Texas and it has an office in Allen, Texas. On information and belief,
8 it is a citizen of Texas.

9 42. WV Water Tech, LLC is alleged to be registered in West Virginia and owned by a
10 West Virginia resident. Am. Compl. ¶ 32. According to the West Virginia Secretary of State, it is
11 organized under the laws of West Virginia and it has its principal office in Shepherdstown, West
12 Virginia. On information and belief, it is a citizen of West Virginia.

13 43. Kdawg Crypto, LLC is alleged to be registered in Connecticut and owned by a
14 Connecticut resident. Am. Compl. ¶ 33. According to the Connecticut Secretary of State, it is
15 organized under the laws of Connecticut and it has its principal office in Milford, Connecticut. On
16 information and belief, it is a citizen of Connecticut.

17 44. Culminate Water Technology, LLC is alleged to be registered in Virginia and
18 owned by a Virginia resident. Am. Compl. ¶ 34. According to the Virginia Secretary of State, it
19 has its principal office in Ashburn, Virginia. According to other research, it is organized under the
20 laws of Virginia. On information and belief, it is a citizen of Virginia.

21 45. ChugIt, LLC is alleged to be registered in Florida and owned by a Tennessee
22 resident. Am. Compl. ¶ 35. According to the Florida Secretary of State, it is organized under the
23 laws of Florida and it has its principal office in St. George, Utah. On information and belief, it is
24 a citizen of Florida and Utah.

25 46. Chaurishi Retail Enterprises, LLC is alleged to be registered in Oregon and owned
26 by an Oregon resident. Am. Compl. ¶ 36. According to the Oregon Secretary of State, it is
27 organized under the laws of Oregon and it has its principal office in Portland, Oregon. On

1 information and belief, it is a citizen of Oregon.

2 47. Progressive Partners, LLC is alleged to be registered in Virginia and owned by a
3 Virginia resident. Am. Compl. ¶ 37. According to the Virginia Secretary of State, it has its
4 principal office in Chantilly, Virginia. According to other research, it is organized under the laws
5 of Virginia. On information and belief, it is a citizen of Virginia.

6 48. 210 SA Holding, LLC is alleged to be registered in Texas and owned by a Texas
7 resident. Am. Compl. ¶ 38. According to the Texas Secretary of State, it is organized under the
8 laws of Texas and it has an address in San Antonio, Texas. On information and belief, it is a citizen
9 of Texas.

10 49. WST Utah LLC is alleged to be registered in Utah and owned by a Utah resident.
11 Am. Compl. ¶ 39. According to the Utah Secretary of State, it is organized under the laws of Utah
12 and it has its principal office in Kaysville, Utah. On information and belief, it is a citizen of Utah.

13 50. V2S2, LLC is alleged to be registered in Colorado and owned by a Colorado
14 resident. Am. Compl. ¶ 40. According to the Colorado Secretary of State, it is organized under the
15 laws of Colorado and it has its principal office in Littleton, Colorado. On information and belief,
16 it is a citizen of Colorado.

17 51. Cyborg Holdings, LLC is alleged to be registered in Washington and owned by an
18 Arizona resident. Am. Compl. ¶ 41. According to the Arizona Corporation Commission, it is
19 organized under the laws of Arizona and has its principal office in Phoenix, Arizona. On
20 information and belief, and notwithstanding the amended complaint allegation, it is a citizen of
21 Arizona.

22 52. ASH Vending, LLC is alleged to be registered in Colorado and owned by a
23 Colorado resident. Am. Compl. ¶ 42. According to the Colorado Secretary of State, it is organized
24 under the laws of Colorado and it has its principal office in Highlands Ranch, Colorado. On
25 information and belief, it is a citizen of Colorado.

26 53. Adventure Done Right, LLC is alleged to be registered in Utah and owned by a
27 Utah resident. Am. Compl. ¶ 43. According to the Utah Secretary of State, it is organized under

1 the laws of Utah and it has an address in Salt Lake City, Utah. On information and belief, it is a
2 citizen of Utah.

3 54. Big Boy Tools LLC is alleged to be registered in Ohio and owned by an Indiana
4 resident. Am. Compl. ¶ 44. According to the Ohio Secretary of State, it is organized under the laws
5 of Ohio. According to other research, it has an address in Perrysburg, Ohio. On information and
6 belief, it is a citizen of Ohio.

7 55. Roman Jarosiewicz is alleged to be a Minnesota resident. Am. Compl. ¶ 45. Mr.
8 Jarosiewicz has an address in Minnesota and is registered to vote in Minnesota. On information
9 and belief, Mr. Jarosiewicz is a citizen of Minnesota.

10 56. Abby Wyatt Group, Inc. is alleged to be registered in South Carolina and owned by
11 a South Carolina resident. Am. Compl. ¶ 46. According to the South Carolina Secretary of State,
12 it is organized under the laws of South Carolina. According to other research, it has an address in
13 Taylors, South Carolina. On information and belief, it is a citizen of South Carolina.

14 57. Aiden Waterworks, LLC is alleged to be registered in Michigan and owned by a
15 Michigan resident. Am. Compl. ¶ 47. According to the Michigan Secretary of State, it is organized
16 under the laws of Michigan. According to other research, it has an address in Northville, Michigan.
17 On information and belief, it is a citizen of Michigan.

18 58. Horeb Water Solutions, LLC is alleged to be registered in Maryland and owned by
19 a Pennsylvania resident. Am. Compl. ¶ 48. According to the Maryland Secretary of State, it is
20 organized under the laws of Maryland and it has its principal office in Elkridge, Maryland. On
21 information and belief, it is a citizen of Maryland.

22 59. Silver Oak H2O, LLC is alleged to be registered in Colorado and owned by a
23 Colorado resident. Am. Compl. ¶ 49. According to the Colorado Secretary of State, it is organized
24 under the laws of Colorado and it has its principal office in Glenwood Springs, Colorado. On
25 information and belief, it is a citizen of Colorado.

26 60. NS SQUARE ECO Waters, LLC, named as NS SQ ECO Waters LLC in the caption
27 of the amended complaint, is alleged to be registered in Illinois and owned by an Illinois resident.

1 Am. Compl. ¶ 50. According to the Illinois Secretary of State, it is organized under the laws of
2 Illinois and has its principal office in Aurora, Illinois. On information and belief, it is a citizen of
3 Illinois.

4 61. JK Seven LLC is alleged to be registered in Delaware and owned by a Texas
5 resident. Am. Compl. ¶ 51. According to the Delaware Secretary of State, it is organized under the
6 laws of Delaware. According to other research, it has an address in Wilmington, Delaware. On
7 information and belief, it is a citizen of Delaware.

8 62. Oed Properties LLC is alleged to be registered in Texas and owned by a Texas
9 resident. Am. Compl. ¶ 53. According to the Texas Secretary of State, it is organized under the
10 laws of Texas and it has an address in The Woodlands, Texas. On information and belief, it is a
11 citizen of Texas.

12 63. JLE Enterprises, LLC is alleged to be registered in Colorado and owned by a
13 Colorado resident. Am. Compl. ¶ 54. According to the Colorado Secretary of State, it is organized
14 under the laws of Colorado and it has its principal office in Castle Rock, Colorado. On information
15 and belief, it is a citizen of Colorado.

16 64. Be of Service, LLC is alleged to be registered in Wyoming and owned by a Texas
17 resident. Am. Compl. ¶ 55. According to the Texas Secretary of State, it is organized under the
18 laws of Texas and it has an address in Las Vegas, Nevada. On information and belief, it is a citizen
19 of Texas and Nevada.

20 65. Etania, LLC is alleged to be registered in Colorado and owned by a Colorado
21 resident. Am. Compl. ¶ 56. According to the Colorado Secretary of State, it is organized under the
22 laws of Colorado and it has its principal office in Denver, Colorado. On information and belief, it
23 is a citizen of Colorado.

24 66. Nira Enterprises, LLC is alleged to be registered in Texas and owned by a Texas
25 resident. Am. Compl. ¶ 57. According to the Texas Secretary of State, it is organized under the
26 laws of Texas and it has an address in Plano, Texas. On information and belief, it is a citizen of
27 Texas.

1 67. Facts Property Services, LLC is alleged to be registered in Arizona and owned by
2 an Arizona resident. Am. Compl. ¶ 58. According to the Arizona Corporation Commission, it is
3 organized under the laws of Arizona and has an address in Phoenix, Arizona. On information and
4 belief, it is a citizen of Arizona.

5 68. IMLSunshine, LLC is alleged to be registered in Kansas and owned by a Kansas
6 resident. Am. Compl. ¶ 59. According to the Kansas Secretary of State, it is organized under the
7 laws of Kansas and it has its principal office in Lawrence, Kansas. On information and belief, it is
8 a citizen of Kansas.

9 69. Redwaters, LLC is alleged to be registered in Illinois and owned by an Illinois
10 resident. Am. Compl. ¶ 60. According to the Illinois Secretary of State, it is organized under the
11 laws of Illinois and it has its principal office in Naperville, Illinois. On information and belief, it
12 is a citizen of Illinois.

13 70. Starter Holdings, LLC is alleged to be registered in Arizona and owned by an
14 Arizona resident. Am. Compl. ¶ 61. According to the Arizona Corporation Commission, it is
15 organized under the laws of Arizona and it has an address in Phoenix, Arizona. On information
16 and belief, it is a citizen of Arizona.

17 71. Helmut Giewat is alleged to be a Florida resident. Am. Compl. ¶ 62. A search for
18 public records about Mr. Giewat indicate that he is deceased. Nonetheless, on the basis of the
19 amended complaint, Mr. Giewat is, on information and belief, a citizen of Florida.

20 72. May Auerbach is alleged to be a California resident. Am. Compl. ¶ 63. Ms.
21 Auerbach has a California address. On information and belief, Ms. Auerbach is a citizen of
22 California.

23 73. Todd Auerbach is not named in the caption of the amended complaint, but he is
24 alleged to be California resident. Am. Compl. ¶ 63. Mr. Auerbach has a California address and is
25 licensed to practice dentistry in California. On information and belief, Mr. Auerbach is a citizen
26 of California.

27 74. Royal Reservoirs, LLC is alleged to be registered in Oklahoma and owned by an

1 Oklahoma resident. Am. Compl. ¶ 64. According to the Oklahoma Secretary of State, it is
2 organized under the laws of Oklahoma. According to other research, it has an address in Edmond,
3 Oklahoma. On information and belief, it is a citizen of Oklahoma.

4 75. Aqualux Water LLC is alleged to be registered in Texas and owned by a Texas
5 resident. Am. Compl. ¶ 65. According to the Texas Secretary of State, it is organized under the
6 laws of Texas and it has an address in Southlake, Texas. On information and belief, it is a citizen
7 of Texas.

8 76. RCWSTECH1157, LLC is alleged to be registered in Illinois and owned by an
9 Illinois resident. Am. Compl. ¶ 67. According to the Illinois Secretary of State, it is organized
10 under the laws of Illinois and it has its principal office in Decatur, Illinois. On information and
11 belief, it is a citizen of Illinois.

12 77. COLEWSTECH, LLC is alleged to be registered in Illinois and owned by an
13 Illinois resident. Am. Compl. ¶ 67. According to the Illinois Secretary of State, it is organized
14 under the laws of Illinois and it has its principal office in Decatur, Illinois. On information and
15 belief, it is a citizen of Illinois.

16 78. Maji 8377, LLC is alleged to be registered in Michigan and owned by a Michigan
17 resident. Am. Compl. ¶ 68. According to the Michigan Secretary of State, it is organized under the
18 laws of Michigan and it has an address in Grand Blanc, Michigan. On information and belief, it is
19 a citizen of Michigan.

20 79. Oaks Waterstation Tech, LLC is alleged to be registered in Wyoming and owned
21 by a Washington resident. Am. Compl. ¶ 69. According to the Washington Secretary of State, it is
22 organized under the laws of Washington and has its principal office in Sammamish, Washington.
23 On information and belief, it is a citizen of Washington.

24 80. SDB H20, LLC is alleged to be registered in Florida and owned by a Florida
25 resident. Am. Compl. ¶ 70. According to the Florida Secretary of State, it is organized under the
26 laws of Florida and it has its principal office in Nokomis, Florida. On information and belief, it is
27 a citizen of Florida.

1 81. WST, LLC is alleged to be registered in Florida and owned by a Florida resident.
2 Am. Compl. ¶ 71. According to the Florida Secretary of State, it is organized under the laws of
3 Florida and it has its principal office in Nokomis, Florida. On information and belief, it is a citizen
4 of Florida.

5 82. Half Full Vending, LLC is alleged to be registered in Texas and owned by a Texas
6 resident. Am. Compl. ¶ 72. According to the Texas Secretary of State, it is organized under the
7 laws of Texas and it has an address in Rosenberg, Texas. On information and belief, it is a citizen
8 of Texas.

9 83. RDWSTECH3594, LLC is alleged to be registered in Michigan and owned by a
10 Michigan resident. Am. Compl. ¶ 73. According to the Michigan Secretary of State, it is organized
11 under the laws of Michigan. According to other research, it has an address in Lexington, Michigan.
12 On information and belief, it is a citizen of Michigan.

13 84. Rose Trail Ventures, LLC is alleged to be registered in Tennessee and owned by a
14 Tennessee Resident. Am. Compl. ¶ 74. According to the Tennessee Secretary of State, it is
15 organized under the laws of Tennessee and it has its principal office in Memphis, Tennessee. On
16 information and belief, it is a citizen of Tennessee.

17 85. Rose Trail Ventures 2, LLC is alleged to be registered in Tennessee and owned by
18 a Tennessee resident. Am. Compl. ¶ 74. According to the Tennessee Secretary of State, it is
19 organized under the laws of Tennessee and it has its principal office in Memphis, Tennessee. On
20 information and belief, it is a citizen of Tennessee.

21 86. Pravin Thakkar Jr. is alleged to be a Tennessee resident. Am. Compl. ¶ 74. Mr.
22 Thakkar has an address in Tennessee and a vehicle registered in Tennessee. On information and
23 belief, he is a citizen of Tennessee.

24 87. Dr. Kwansoo Lee is alleged to be a Washington resident. Am. Compl. ¶ 11. Mr.
25 Lee has a Washington address and is licensed to practice dentistry in Washington. On information
26 and belief, Mr. Lee is a citizen of Washington.

27 88. Tom Anderson is alleged to be a Florida resident. Am. Compl. ¶ 12. Mr. Anderson

1 has a Florida address and is registered to vote in Florida. On information and belief, Mr. Anderson
2 is a citizen of Florida.

3 89. Abbey Anderson is alleged to be a Florida resident. Am. Compl. ¶ 12. Ms.
4 Anderson has a Florida address and is registered to vote in Florida. On information and belief, Ms.
5 Anderson is a citizen of Florida.

6 90. Dr. Brian Chu is alleged to be a California resident. Am. Compl. ¶ 15. Dr. Chu has
7 a California address and is licensed to practice dentistry in California. On information and belief,
8 Dr. Brian Chu is a citizen of California.

9 91. Dr. Larina Chu is alleged to be a California resident. Am. Compl. ¶ 15. Dr. Chu has
10 a California address and is licensed to practice dentistry in California. On information and belief,
11 Dr. Larina Chu is a citizen of California.

12 92. David Schroeder is alleged to be an Indiana resident. Am. Compl. ¶ 13. Mr.
13 Schroeder has an Indiana address and is registered to vote in Indiana. On information and belief,
14 Mr. Schroeder is a citizen of Indiana.

15 93. Sarah Schroeder is alleged to be an Indiana resident. Am. Compl. ¶ 13. Ms.
16 Schroeder has an Indiana address and is registered to vote in Indiana. On information and belief,
17 Ms. Schroeder is a citizen of Indiana.

18 94. Reginald Franklin is alleged to be a New York resident. Am. Compl. ¶ 14. Mr.
19 Franklin has a New York address but has a Texas driver's license and is registered to vote in Texas.
20 On information and belief, Mr. Franklin is a citizen of Texas.

21 95. Angel Franklin is alleged to be a New York resident. Am. Compl. ¶ 14. Ms.
22 Franklin has a New York address but has a Texas driver's license and is registered to vote in Texas.
23 On information and belief, Ms. Franklin is a citizen of Texas.

24 96. Dylan Ross is alleged to be a New York resident. Am. Compl. ¶ 17. Mr. Ross has
25 a New York address and is registered to vote in New York. On information and belief, Mr. Dylan
26 Ross is a citizen of New York.

27 97. Taylor Ross is alleged to be a New York resident. Am. Compl. ¶ 17. Mr. Ross has

1 a New Jersey address and is registered to vote in New York. On information and belief, Mr. Taylor
2 Ross is a citizen of New Jersey.

3 98. Cody Bishop is alleged to be a Tennessee resident. Am. Compl. ¶ 16. Mr. Bishop
4 has a Tennessee address and a vehicle registered in Tennessee. On information and belief, Mr.
5 Bishop is a citizen of Tennessee.

6 99. David Brown is alleged to be an Oregon resident. Am. Compl. ¶ 18. Mr. Brown has
7 an Oregon address. On information and belief, Mr. Brown is a citizen of Oregon.

8 100. Karthika Mandyam is alleged to be a Texas resident. Am. Compl. ¶ 19. Ms.
9 Mandyam has a Texas address and a vehicle registered in Texas. On information and belief, Ms.
10 Mandyam is a citizen of Texas.

11 101. David Beranek is alleged to be a Virginia resident. Am. Compl. ¶ 20. Mr. Beranek
12 has a Virginia address and is licensed as a pilot with a Virginia address. On information and belief,
13 Mr. Beranek is a citizen of Virginia.

14 102. Susan Pinkerton is alleged to be a Florida resident. Am. Compl. ¶ 21. Ms. Pinkerton
15 has a Florida address and is registered to vote in Florida. On information and belief, she is a citizen
16 of Florida.

17 103. Radhika Siripireddy is alleged to be a Texas resident. Am. Compl. ¶ 22. Ms.
18 Siripireddy has a Texas address and is registered to vote in Texas. On information and belief, Ms.
19 Siripireddy is a citizen of Texas.

20 104. Karl Schoenleber is alleged to be a South Carolina resident. Am. Compl. ¶ 23. Mr.
21 Schoenleber has a South Carolina address and is registered to vote in South Carolina. On
22 information and belief, Mr. Schoenleber is a citizen of South Carolina.

23 105. James Sartain is alleged to be a Texas resident. Am. Compl. ¶ 24. Mr. Sartain has
24 a Texas address and is registered to vote in Texas. On information and belief, Mr. Sartain is a
25 citizen of Texas.

26 106. Nirupa Keskar is alleged to be a Texas resident. Am. Compl. ¶ 25. Ms. Keskar has
27 a Texas address and is registered to vote in Texas. On information and belief, Ms. Keskar is a

1 citizen of Texas.

2 107. John Flack is alleged to be a Tennessee resident. Am. Compl. ¶ 26. Mr. Flack has
3 a Tennessee address and a vehicle registered in Tennessee. On information and belief, Mr. Flack
4 is a citizen of Tennessee.

5 108. Trung Nguyen is alleged to be a Texas resident. Am. Compl. ¶ 27. Mr. Nguyen has
6 a Texas address and is registered to vote in Texas. On information and belief, Mr. Nguyen is a
7 citizen of Texas.

8 109. Li Liang is alleged to be a Texas resident. Am. Compl. ¶ 27. Ms. Liang has a Texas
9 address and is registered to vote in Texas. On information and belief, Ms. Liang is a citizen of
10 Texas.

11 110. Tan Quan Nguyen is alleged to be a Maryland resident. Am. Compl. ¶ 66. Mr.
12 Nguyen has a Maryland address. On information and belief, Mr. Nguyen is a citizen of Maryland.

13 111. Ashoka Sheanh is alleged to be a Virginia resident. Am. Compl. ¶ 28. Mr. Sheanh
14 has a Virginia address. On information and belief, Mr. Sheanh is a citizen of Virginia.

15 112. Mathew Fellows is alleged to be a Kansas resident. Am. Compl. ¶ 29. Mr. Fellows
16 has a Kansas address. On information and belief, Mr. Fellows is a citizen of Kansas.

17 113. Charles Coggins is alleged to be a North Carolina resident. Am. Compl. ¶ 30. Mr.
18 Coggins has a North Carolina address. On information and belief, Mr. Coggins is a citizen of North
19 Carolina.

20 114. Thomas Wawersich is alleged to be a Texas resident. Am. Compl. ¶ 31. Mr.
21 Wawersich has a Texas address and is registered to vote in Texas. On information and belief, Mr.
22 Wawersich is a citizen of Texas.

23 115. Jason Blough is alleged to be a West Virginia resident. Am. Compl. ¶ 32. Mr.
24 Blough has a West Virginia address and is registered to vote in West Virginia. On information and
25 belief, Mr. Blough is a citizen of West Virginia citizen.

26 116. Michele Blough is alleged to be a West Virginia resident. Am. Compl. ¶ 32. Ms.
27 Blough has a West Virginia address and is registered to vote in West Virginia. On information and

1 belief, Ms. Blough is a citizen of West Virginia.

2 117. Karen Lavin is alleged to be a Connecticut resident. Am. Compl. ¶ 33. Ms. Lavin
3 has a Connecticut address. On information and belief, Ms. Lavin is a citizen of Connecticut.

4 118. Padma Kandikonda is alleged to be a Virginia resident. Am. Compl. ¶ 34. Ms.
5 Kandikonda has a Virginia address. On information and belief, Ms. Kandikonda is a citizen of
6 Virginia.

7 119. Pavan Kandikonda is alleged to be a Virginia resident. Am. Compl. ¶ 34. Mr.
8 Kandikonda has a Virginia address. On information and belief, Mr. Kandikonda is a citizen of
9 Virginia.

10 120. James Vilt II is alleged to be a Tennessee resident. Am. Compl. ¶ 35. Mr. Vilt has a
11 Tennessee address and has a vehicle registered in Tennessee. On information and belief, Mr. Vilt
12 is a citizen of Tennessee.

13 121. Basant Kumar is alleged to be an Oregon resident. Am. Compl. ¶ 36. Mr. Kumar
14 has an Oregon address. On information and belief, Mr. Kumar is a citizen of Oregon.

15 122. Radhika Kamalla is alleged to be a Virginia resident. Am. Compl. ¶ 37. Ms.
16 Kamalla has a Virginia address. On information and belief, Ms. Kamalla is a citizen of Virginia.

17 123. Marc Hildebrand is alleged to be a Texas resident. Am. Compl. ¶ 38. Mr.
18 Hildebrand has a Texas address and is registered to vote in Texas. On information and belief, Mr.
19 Hildebrand is a citizen of Texas.

20 124. Debra Hildebrand is alleged to be a Texas resident. Am. Compl. ¶ 38. Ms.
21 Hildebrand has a Texas address and is registered to vote in Texas. On information and belief, Ms.
22 Hildebrand is a citizen of Texas.

23 125. Merrill Stoddard is alleged to be a Utah resident. Am. Compl. ¶ 39. Mr. Stoddard
24 has a Utah address and is registered to vote in Utah. On information and belief, Mr. Stoddard is a
25 citizen of Utah.

26 126. Danielle Stoddard is alleged to be a Utah resident. Am. Compl. ¶ 39. Ms. Stoddard
27 has a Utah address and is registered to vote in Utah. On information and belief, Ms. Stoddard is a

1 citizen of Utah.

2 127. Venkita Sharma is alleged to be a Colorado resident. Am. Compl. ¶ 40. Mr. Sharma
3 has a Colorado address and is registered to vote in Colorado. On information and belief, Mr.
4 Sharma is a citizen of Colorado.

5 128. Timothy Dailey is alleged to be an Arizona resident. Am. Compl. ¶ 41. Mr. Dailey
6 has an Arizona address. On information and belief, Mr. Dailey is a citizen of Arizona.

7 129. Robert Hoery is alleged to be a Colorado resident. Am. Compl. ¶ 42. Mr. Hoery
8 has a Colorado address and is registered to vote in Colorado. On information and belief, Mr. Hoery
9 is a citizen of Colorado.

10 130. Stefani Hoery is alleged to be a Colorado resident. Am. Compl. ¶ 42. Ms. Hoery
11 has a Colorado address and is registered to vote in Colorado. On information and belief, Ms. Hoery
12 is a citizen of Colorado.

13 131. Sean Done is alleged to be a Utah resident. Am. Compl. ¶ 43. Mr. Done has a Utah
14 address and is registered to vote in Utah. On information and belief, Mr. Done is a citizen of Utah.

15 132. Anna Done is alleged to be a Utah resident. Am. Compl. ¶ 43. Ms. Done has a Utah
16 address and is registered to vote in Utah. On information and belief, Ms. Done is a citizen of Utah.

17 133. Sterling Davis is alleged to be an Indiana resident. Am. Compl. ¶ 44. Mr. Davis has
18 an Indiana address and is registered to vote in Indiana. On information and belief, Mr. Davis is a
19 citizen of Indiana.

20 134. Mark Fleming is alleged to be a South Carolina resident. Am. Compl. ¶ 46. Mr.
21 Fleming has a South Carolina address and is registered to vote in South Carolina. On information
22 and belief, Mr. Fleming is a citizen of South Carolina.

23 135. Stacey Fleming is alleged to be a South Carolina resident. Am. Compl. ¶ 46. Ms.
24 Fleming has a South Carolina address and is registered to vote in South Carolina. On information
25 and belief, Ms. Fleming is a citizen of South Carolina.

26 136. Bo Yang is alleged to be a Michigan resident. Am. Compl. ¶ 47. Mr. Yang has a
27 Michigan address and is registered to vote in Michigan. On information and belief, Mr. Yang is a

1 citizen of Michigan.

2 137. Steven Wells is alleged to be a Pennsylvania resident. Am. Compl. ¶ 48. Mr. Wells
3 has a Pennsylvania address and is registered to vote in Pennsylvania. On information and belief,
4 Mr. Wells is a citizen of Pennsylvania.

5 138. Dustin Braeger is alleged to be a Colorado resident. Am. Compl. ¶ 49. Mr. Braeger
6 has a Colorado address and is registered to vote in Colorado. On information and belief, Mr.
7 Braeger is a citizen of Colorado.

8 139. Navaneeth Kumar is alleged to be an Illinois resident. Am. Compl. ¶ 50. Mr. Kumar
9 has an Illinois address and a vehicle that is registered in Illinois. On information and belief, Mr.
10 Kumar is a citizen of Illinois.

11 140. William White is alleged to be a Texas resident. Am. Compl. ¶ 51. Mr. White has
12 a Texas address and is registered to vote in Texas. On information and belief, he is a citizen of
13 Texas.

14 141. Jeannette White is alleged to be a Texas resident. Am. Compl. ¶ 51. Ms. White has
15 a Texas address and is registered to vote in Texas. On information and belief, Ms. White is a citizen
16 of Texas.

17 142. Jeffrey Brooke, listed twice in the caption of the amended complaint, is alleged to
18 be an Illinois resident. Am. Compl. ¶ 52. Mr. Brooke has an Illinois address. On information and
19 belief, Mr. Brooke is a citizen of Illinois.

20 143. Joshua Oed is alleged to be a Texas resident. Am. Compl. ¶ 53. Mr. Oed has a Texas
21 address and is registered to vote in Texas. On information and belief, Mr. Oed is a citizen of Texas.

22 144. James Estes is alleged to be a Colorado resident. Am. Compl. ¶ 54. Mr. Estes has a
23 Colorado address and is registered to vote in Colorado. On information and belief, Mr. Estes is a
24 citizen of Colorado.

25 145. The complaint does not contain an allegation as to the residency of Adria Estes but
26 lists her in the caption. Ms. Estes has a Colorado address and she is registered to vote in Colorado.
27 On information and belief, Ms. Estes is a citizen of Colorado.

1 146. Michael Bailey is alleged to be a Texas resident. Am. Compl. ¶ 55. Mr. Bailey has
2 a Tennessee address and a Tennessee driver's license. On information and belief, notwithstanding
3 the allegation in the complaint, Mr. Bailey is a citizen of Tennessee.

4 147. Karthiga Jayaram is alleged to be a Colorado resident. Am. Compl. ¶ 56. Ms.
5 Jayaram has a Colorado address and a vehicle that is registered in Colorado. On information and
6 belief, Ms. Jayaram is a citizen of Colorado.

7 148. Karthikeyan Ramprasath is alleged to be a Colorado resident. Am. Compl. ¶ 56.
8 Mr. Ramprasath has a Colorado address and a vehicle registered in Colorado. On information and
9 belief, Mr. Ramprasath is a citizen of Colorado.

10 149. Archan Tikoti is alleged to be a Texas resident. Am. Compl. ¶ 57. Mr. Tikoti has a
11 Texas address and he is registered to vote in Texas. On information and belief, Mr. Tikoti is a
12 citizen of Texas.

13 150. Aashish Parekh is alleged to be an Arizona resident. Am. Compl. ¶ 58. Mr. Parekh
14 has an Arizona address. On information and belief, Mr. Parekh is a citizen of Arizona.

15 151. Dr. Jacob Letourneau is alleged to be a Kansas resident. Am. Compl. ¶ 59. Dr.
16 Letourneau has a Kansas address and a license to practice optometry in Kansas. On information
17 and belief, he is a citizen of Kansas.

18 152. Karla Letourneau is alleged to be a Kansas resident. Am. Compl. ¶ 59. Ms.
19 Letourneau has a Kansas address and has a vehicle registered in Kansas. On information and belief,
20 she is a citizen of Kansas.

21 153. Konda Reddy Gadi is alleged to be an Illinois resident. Am. Compl. ¶ 60. Mr. Gadi
22 has an Illinois address and has a vehicle registered in Illinois. On information and belief, Mr. Gadi
23 is a citizen of Illinois.

24 154. Sreelakshmi Siripuram is alleged to be an Illinois resident. Am. Compl. ¶ 60. Ms.
25 Siripuram has an Illinois address. On information and belief, Mr. Siripuram is a citizen of Illinois.

26 155. Joshua Leykam is alleged to be an Arizona resident. Am. Compl. ¶ 61. Mr. Leykam
27 has an Arizona address. On information and belief, Mr. Leykam is a citizen of Arizona.

1 156. Paige Leykam is alleged to be an Arizona resident. Am. Compl. ¶ 61. Ms. Leykam
2 has an Arizona address and is licensed as a nurse practitioner in Arizona. On information and
3 belief, Ms. Leykam is a citizen of Arizona.

4 157. Dr. Deren Flesher is alleged to be an Oklahoma resident. Am. Compl. ¶ 64. Dr.
5 Flesher has an Oklahoma address and he is registered to vote in Oklahoma. On information and
6 belief, Dr. Flesher is a citizen of Oklahoma.

7 158. Gary Young is alleged to be a Texas resident. Am. Compl. ¶ 65. Mr. Young has a
8 Texas address and is registered to vote in Texas. On information and belief, Mr. Young is a citizen
9 of Texas.

10 159. The Complaint makes no allegations regarding Heidi Young's residency but lists
11 her in the caption. Ms. Young has a Texas address and is registered to vote in Texas. On
12 information and belief, Ms. Young is a citizen of Texas.

13 160. Dr. Ronald Cole is alleged to be an Illinois resident. Am. Compl. ¶ 67. Dr. Cole has
14 an Illinois address and has a license to practice dentistry in Illinois. On information and belief, Dr.
15 Cole is a citizen of Illinois.

16 161. Dr. James Walker is alleged to be a Michigan resident. Am. Compl. ¶ 68. Mr
17 Walker has a Michigan address and he is licensed to practice medicine in Michigan. On
18 information and belief, Mr. Walker is a citizen of Michigan.

19 162. Duane Okamoto is alleged to be a Washington resident. Am. Compl. ¶ 69. Mr.
20 Okamoto has a Washington address. On information and belief, Mr. Okamoto is a citizen of
21 Washington.

22 163. Linda Okamoto is alleged to be a Washington resident. Am. Compl. ¶ 69. Ms.
23 Okamoto has a Washington address. On information and belief, Ms. Okamoto is a citizen of
24 Washington.

25 164. Dr. Scott Burau is alleged to be a Florida resident. Am. Compl. ¶ 70. Dr. Burau has
26 a Michigan address and is licensed to practice dentistry in Michigan. On information and belief,
27 Dr. Scott Burau is a citizen of Michigan.

1 165. Dr. Brad Burau is alleged to be a Florida resident. Am. Compl. ¶ 71. Dr. Burau has
2 a Florida address and is registered to vote in Florida. On information and belief, Dr. Burau is a
3 citizen of Florida.

4 166. Josh McNary is alleged to be a Texas resident. Am. Compl. ¶ 72. Mr. McNary has
5 a Texas address and a vehicle registered in Texas. On information and belief, Mr. McNary is a
6 citizen of Texas.

7 167. Dr. Robert Dost is alleged to be a Michigan resident. Am. Compl. ¶ 73. Dr. Dost
8 has a Michigan address. On information and belief, Dr. Dost is a citizen of Michigan.

9 168. James Group Int, LLC is alleged to be a Nevada limited liability company. James
10 Group Compl. ¶ 1.1. According to the Nevada Secretary of State, it is organized under the laws of
11 Nevada and has an address in Carson City, Nevada. On information and belief, it is a citizen of
12 Nevada.

13 169. Axial Tilt, LLC is alleged to be a Delaware limited liability company. Axial Tilt
14 Compl. ¶ 1. According to the Delaware Secretary of State, it is organized under the laws of
15 Delaware. On information and belief, it is a citizen of Delaware.

16 170. Mod Holdings, LLC is alleged to be a Delaware limited liability company. Axial
17 Tilt Compl. ¶ 2. According to the Delaware Secretary of State, it is organized under the laws of
18 Delaware and according to other research, it has an address in Lewes, Delaware. On information
19 and belief, it is a citizen of Delaware.

20 171. JRC Real Estate III, LLC is alleged to be a California limited liability company.
21 JRC Real Estate Compl. ¶ 2. According to the California Secretary of State, it is organized under
22 the laws of California and has its principal office in Queen Creek, Arizona. On information and
23 belief, it is a citizen of California and Arizona.

24 172. Pure Water Vending is alleged to be a Washington limited liability company. Pure
25 Water Vending Compl. ¶ 1. According to the Washington Secretary of State, it is organized under
26 the laws of Washington and it has its principal office in Spokane, Washington. On information and
27 belief, it is a citizen of Washington.

1 173. Emmatoine, LLC is alleged to be a Florida limited liability company. Emmatoine
2 Compl. ¶ 1.1. According to the Florida Secretary of State, it is organized under the laws of Florida
3 and it has its principal office in Bradenton, Florida. On information and belief, it is a citizen of
4 Florida.

5 174. Rhino Manufacturing, Inc. is alleged to be a Washington corporation. Rhino
6 Manufacturing Compl. ¶ 1. According to the Washington Secretary of State, it is incorporated in
7 Washington and it has its principal office in Monroe, Washington. On information and belief, it is
8 a citizen of Washington.

9 175. Rhino Investments, LLC is alleged to be Oregon limited liability company. Rhino
10 Manufacturing Compl. ¶ 2. According to the Oregon Secretary of State, it is organized under the
11 laws of Oregon and it has an address in Powell Butte, Oregon. On information and belief, it is a
12 citizen of Oregon.

13 176. Rex Ventures, LLC is alleged to be a Colorado limited liability company. Rex
14 Ventures Compl. ¶ 1.1. According to the Colorado Secretary of State, it is organized under the
15 laws of Colorado and it has its principal office in Arvada, Colorado. On information and belief, it
16 is a citizen of Colorado.

17 177. Dennis Demirjian is alleged to be a resident of Florida. Demirjian Compl. ¶ 1. Dr.
18 Demirjian has a Florida address and is licensed to practice dentistry in Florida. On information
19 and belief, Dr. Demirjian is a citizen of Florida.

20 178. Tanushka Water Vending LLC is alleged to be a Georgia limited liability company.
21 Tanushka Water Vending Compl. ¶ 1. According to the Georgia Secretary of State, it is organized
22 under the laws of Georgia and it has its principal office in College Park, Georgia. On information
23 and belief, it is a citizen of Georgia.

24 179. Aarana Water Vending is alleged to be a California limited liability company.
25 Tanushka Water Vending Compl. ¶ 1. According to the California Secretary of State, it is
26 organized under the laws of California and it has its principal office in Fremont, California. On
27 information and belief, it is a citizen of California.

180. Wakanda Ventures is alleged to be a New Jersey limited liability company. Wakanda Ventures Compl. ¶ 1. According to public records, it is organized under the laws of New Jersey and it has an address in Jersey City, New Jersey. On information and belief, it is a citizen of New Jersey.

181. Paul Martinchuk is alleged to be a resident of California. Martinchuk Compl. ¶ 1.1. Mr. Martinchuk has a California address. On information and belief, Mr. Martinchuk is a citizen of California.

DEFENDANTS' CITIZENSHIP

182. Ryan R. Wear is alleged to reside and conduct business in Snohomish County, Washington. Am. Compl. ¶ 75; James Group Compl. ¶ 1.4; Pure Water Vending Compl. ¶ 4; Demirjian Compl. ¶ 8; Tanushka Water Vending Compl. ¶ 2; Wakanda Ventures Compl. ¶ 3; Martinchuk Compl. ¶ 1.5. Mr. Wear has a Washington address. On information and belief, Mr. Wear is a citizen of Washington.

183. Rebecca A. Swain is alleged to reside in Snohomish County, Washington. Am. Compl. ¶ 75; Martinchuk Compl. ¶ 1.5. Ms. Swain has a Washington address. On information and belief, Ms. Swain is a citizen of Washington.

184. Creative Technologies, LLC d/b/a Waterstation Technology is alleged to engage in business activities in Snohomish County, Washington. Am. Compl. ¶ 76; James Group Compl. ¶ 1.3; Rhino Manufacturing Compl. ¶ 3; Demirjian Compl. ¶ 3; Martinchuk Compl. ¶ 1.4. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

185. WST Franchise Systems LLC is alleged to be registered in Washington and owned by a Washington resident. Am. Compl. ¶ 77; Pure Water Vending Compl. ¶ 3; Rex Ventures Compl. ¶ 1.2; Martinchuk Copml. ¶ 1.3. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

186. Water Station Management, LLC, incorrectly named in the Axial Tilt complaint as “WaterStation, LLC,” is alleged to be registered in Washington and owned by a Washington resident. Am. Compl. ¶ 78; James Group Compl. ¶ 1.2; Axil Tilt Compl. ¶ 3; JRC Real Estate Compl. ¶ 3; Pure Water Vending Compl. ¶ 2; Emmatoine Compl. ¶ 1.2; Rhino Manufacturing Compl. ¶ 4; Rex Ventures Compl. ¶ 1.3; Demirjian Compl. ¶ 2; Tanushka Water Vending Compl. ¶ 2; Wakanda Ventures Compl. ¶ 2; Martinchuk Compl. ¶ 1.2. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

187. Kevin Nooney is alleged to be a Washington resident and to conduct business in Snohomish County, Washington. Am. Compl. ¶ 79; Demirjian Compl. ¶ 7; Martinchuk Compl. ¶ 1.10. Mr. Nooney has a Washington address. On information and belief, Mr. Nooney is a citizen of Washington.

188. Elizabeth Nooney is alleged to be a Washington resident. Am. Compl. ¶ 79; Martinchuk Compl. ¶ 1.10. Ms. Nooney has a Washington address. On information and belief, Ms. Nooney is a citizen of Washington.

189. Refreshing USA LLC is alleged to engage in business activities in Snohomish County. Am. Compl. ¶ 80; Demirjian Compl. ¶ 4. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

190. Summit Management Services, LLC is alleged to engage in business activities in Snohomish County. Am. Compl. ¶ 81; Demirjian Compl. ¶ 6. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

191. Ideal Property Investments, LLC is alleged to engage in business activities in Snohomish County. Am. Compl. ¶ 82; Demirjian Compl. ¶ 5. According to the Washington Secretary of State, it is organized under the laws of Washington and it has its principal office in Everett, Washington. On information and belief, it is a citizen of Washington.

1 192. Refreshing California LLC is alleged to engage in business activities in Snohomish
2 County. Am. Compl. ¶ 83. According to the California Secretary of State, it is organized under the
3 laws of California and it has its principal office in Indio, California. On information and belief, it
4 is a citizen of California.

5 193. Refreshing Montana, LLC is alleged to engage in business activities in Snohomish
6 County. Am. Compl. ¶ 84. According to the Montana Secretary of State, it is organized under the
7 laws of Montana and it has its principal office in Missoula Montana. On information and belief, it
8 is a citizen of Montana.

9 194. Refreshing Mid-Atlantic, LLC is alleged to engage in business activities in
10 Snohomish County. Am. Compl. ¶ 85. According to the Pennsylvania Secretary of State, it is
11 organized under the laws of Pennsylvania. According to other research, it has a Pennsylvania
12 address. On information and belief, it is a citizen of Pennsylvania.

13 195. Refreshing Carolinas, LLC is alleged to engage in business activities in Snohomish
14 County. Am. Compl. ¶ 86. According to the North Carolina Secretary of State, it is organized
15 under the laws of North Carolina and it has its principal office in Everett, Washington. On
16 information and belief, it is a citizen of North Carolina and Washington.

17 196. Refreshing Great Lakes, LLC is alleged to engage in business activities in
18 Snohomish County. Am. Compl. ¶ 87. According to the Illinois Secretary of State, it is organized
19 under the laws of Illinois and it has its principal office in Elk Grove Village, Illinois. On
20 information and belief, it is a citizen of Illinois.

21 197. WaterStation Finance Company, LLC is alleged to engage in business activities in
22 Snohomish County. Am. Compl. ¶ 88. According to the Washington Secretary of State, it is
23 organized under the laws of Washington and it has its principal office in Everett, Washington. On
24 information and believe, it is a citizen of Washington.

25 198. Refreshing Georgia, LLC is alleged to engage in business activities in Snohomish
26 County. Am. Compl. ¶ 89. According to the Georgia Secretary of State, it is organized under the
27 laws of Georgia and it has its principal office in Marietta, Georgia. On information and belief, it

1 is a citizen of Georgia.

2 199. Creative Technologies Florida, LLC is alleged to engage in business activities in
3 Snohomish County. Am. Compl. ¶ 90. According to the Florida Secretary of State, Creative
4 Technologies Florida, LLC is a trade name of Creative Technologies, LLC which is a Washington
5 LLC. According to the Washington Secretary of State, Creative Technologies, LLC is organized
6 under the laws of Washington and has its principal office in Everett, Washington. *See also supra*
7 ¶ 184. On information and belief, Creative Technologies Florida, LLC is merely a trade name for
8 a citizen of Washington and not an unincorporated association whose citizenship must be
9 separately alleged.

10 200. Refreshing Florida, LLC is alleged to engage in business activities in Snohomish
11 County. Am. Compl. ¶ 91. According to the Florida Secretary of State, it is organized under the
12 laws of Florida and it has its principal office in Fort Myers, Florida. On information and belief, it
13 is a citizen of Florida.

14 201. 2129 Andrea Lane LLC is alleged to engage in business activities in Snohomish
15 County. Am. Compl. ¶ 92. According to the Wyoming Secretary of State, it is formed under the
16 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
17 it is a citizen of Wyoming.

18 202. 3209 Van Buren LLC is alleged to engage in business activities in Snohomish
19 County. Am. Compl. ¶ 93. According to the Wyoming Secretary of State, it is formed under the
20 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
21 it is a citizen of Wyoming.

22 203. Ice & Water Vendors, LLC is alleged to engage in business activities in Snohomish
23 County. Am. Compl. ¶ 95. According to the Arizona Corporation Commission, it is formed under
24 the laws of Arizona and it has its principal office in Apache Junction, Arizona. On information
25 and belief, it is a citizen of Arizona.

26 204. Ideal Industrial Park, LLC is alleged to engage in business activities in Snohomish
27 County. Am. Compl. ¶ 96. According to the Wyoming Secretary of State, it is organized under the

1 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
2 it is a citizen of Wyoming.

3 205. Ideal AZ Property Investments, LLC is alleged to engage in business activities in
4 Snohomish County. Am. Compl. ¶ 97. According to the Arizona Corporations Commission, Ideal
5 AZ Property Investments, LLC is the fictitious name for Ideal Property Investments, LLC, *see*
6 *supra* ¶ 191, a Washington citizen. On information and belief, Ideal AZ Property Investments,
7 LLC is not an unincorporated association whose citizenship must be separately alleged.

8 206. K-2 Acquisition, LLC is alleged to engage in business activities in Snohomish
9 County. Am. Compl. ¶ 98. According to the Washington Secretary of State, it is organized under
10 the laws of Washington and it has its principal office in Everett, Washington. On information and
11 belief, it is a citizen of Washington.

12 207. Emery Development, LLC is alleged to engage in business activities in Snohomish
13 County. Am. Compl. ¶ 99. According to the Washington Secretary of State, it is organized under
14 the laws of Washington and it has its principal office in Everett, Washington. On information and
15 belief, it is a citizen of Washington.

16 208. Arizona Water Vendors Incorporated is alleged to be a limited liability company
17 owned by a Washington resident. According to the Arizona Corporation Commission, it is a
18 corporation incorporated in Arizona and has an office in Apache Junction, Arizona. On
19 information and belief, it is a citizen of Arizona.

20 209. WST AZ Properties LLC is alleged to engage in business activities in Snohomish
21 County. Am. Compl. ¶ 101. According to the Arizona Corporation Commission, it is organized
22 under the laws of Arizona and it has a Washington address. On information and belief, it is a citizen
23 of Washington and Arizona.

24 210. 1118 Virginia Street LLC, named in the case caption as 1118 Virginia Avenue LLC
25 but described in the body as 1118 Virginia Street, is alleged to engage in business activities in
26 Snohomish County. Am. Compl. ¶ 102. According to the Washington Secretary of State, it is
27 organized under the laws of Washington and it has its principal office in Everett, Washington. On

1 information and belief, it is a citizen of Washington.

2 211. 11519 South Petropark LLC is alleged to engage in business activities in
3 Snohomish County. Am. Compl. ¶ 103. According to the Washington Secretary of State, it is
4 organized under the laws of Washington and it has its principal office in Houston, Texas. On
5 information and belief, it is a citizen of Washington and Texas.

6 212. TCR Plumbing, LLC is alleged to engage in business activities in Snohomish
7 County. Am. Compl. ¶ 104. According to the Arizona Corporation Commission, it is organized
8 under the laws of Arizona and it has an address in Everett, Washington. On information and belief,
9 it is a citizen of Arizona and Washington.

10 213. 3422 W Clarendon Ave LLC is alleged to engage in business activities in
11 Snohomish County. Am. Compl. ¶ 105. According to the Wyoming Secretary of State, it is
12 organized under the laws of Wyoming and its principal office is in Jackson, Wyoming. On
13 information and belief, it is a citizen of Wyoming.

14 214. 1206 Hewitt Ave LLC is alleged to engage in business activities in Snohomish
15 County. Am. Compl. ¶ 106. According to the Washington Secretary of State, it is organized under
16 the laws of Washington and it has its principal office in Everett, Washington. On information and
17 belief, it is a citizen of Washington.

18 215. Waterstation Technology II, LLC is alleged to engage in business activities in
19 Snohomish County. Am. Compl. ¶ 107. According to the Wyoming Secretary of State, it is
20 organized under the laws of Wyoming and has its principal office in Everett, Washington. On
21 information and belief, it is a citizen of Wyoming and Washington.

22 216. Pistol, Inc. is alleged to be a Wyoming corporation. Am. Compl. ¶ 108. According
23 to the Wyoming Secretary of State, it is incorporated in Wyoming and has its principal office in
24 Jackson, Wyoming. On information and belief, it is a citizen of Wyoming.

25 217. Smokey Point Holdings, LLC is alleged to engage in business activities in
26 Snohomish County. Am. Compl. ¶ 109. According to the Wyoming Secretary of State, it is
27 organized under the laws of Wyoming and has its principal office in Jackson, Wyoming. On

1 information and belief, it is a citizen of Wyoming.

2 218. 602 South Meadow, LLC is alleged to engage in business activities in Snohomish
3 County. Am. Compl. ¶ 111. According to the Wyoming Secretary of State, it is formed under the
4 laws of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief,
5 it is a citizen of Wyoming.

6 219. 719 Eden, LLC is alleged to engage in business activities in Snohomish County and
7 to be owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 110. Public records
8 searches do not reveal its state of organization or principal place of business. Public records
9 searches do reveal that a company named 701 Eden is organized under the laws of North Carolina
10 and it has its principal office in Jackson, Wyoming. Nonetheless, on the basis of the amended
11 complaint and on information and belief, 719 Eden, LLC is a citizen of Washington.

12 220. 343 Group LLC is named in the caption of the amended complaint, *see* Am. Compl.
13 at 3–4, but not in the body of the amended complaint. “Group, LLC” is named in the body of the
14 amended complaint and is alleged to engage in business activities in Snohomish County and to be
15 owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 112. Public records
16 searches do not reveal the state of organization or principal place of business of a company by
17 either name. On information and belief, it is a citizen of Washington where Mr. Ryan Wear is
18 domiciled.

19 221. 4300 Forest LLC is alleged to engage in business activities in Snohomish County.
20 Am. Compl. ¶ 113. According to the Wyoming Secretary of State, it is organized under the laws
21 of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief, it is
22 a citizen of Wyoming.

23 222. 70 NO Garden, LLC is alleged to engage in business activities in Snohomish
24 County and to be owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 114.
25 Public records searches do not reveal its state of organization or principal place of business. On
26 information and belief, it is a citizen of Washington where Mr. Ryan Wear is domiciled.

27 223. 204 NWW LLC is alleged to engage in business activities in Snohomish County.

1 Am. Compl. ¶ 115. According to the Wyoming Secretary of State, it is organized under the laws
2 of Wyoming and it has its principal office in Jackson, Wyoming. On information and belief, it is
3 a citizen of Wyoming.

4 224. Waterstation Techventure, LLC is alleged to engage in business activities in
5 Snohomish County. Am. Compl. ¶ 116. According to the Washington Secretary of State, it has
6 been voluntarily dissolved, but it was organized under the laws of Washington and it had its
7 principal office in Everett, Washington. On information and belief, Waterstation Techventure,
8 LLC is a citizen of Washington.

9 225. Water Station Holdings LLC is alleged to engage in business activities in
10 Snohomish County. Am. Compl. ¶ 117. According to the Indiana Secretary of State, it is organized
11 under the laws of Indiana and its principal office is in Indianapolis, Indiana. On information and
12 belief, it is a citizen of Indiana.

13 226. Waterstation Technology, LLC is alleged to be the trade name of Creative
14 Technologies, LLC. Am. Compl. ¶ 76. Separately, the amended complaint alleges, “Water Station
15 Holdings, LLC, WaterStation Technology, LLC, on information and belief, is a limited liability
16 company owned, operated, and controlled by Defendant Wear that engages in business activities
17 in Snohomish County.” Am. Compl. ¶ 117. On information and belief, Waterstation Technology,
18 LLC is the trade name for a citizen of Washington, *see supra* ¶ 184, not an unincorporated
19 association whose citizenship must be separately alleged.

20 227. Refreshing Colorado LLC is alleged to engage in business activities in Snohomish
21 County. Am. Compl. ¶ 117. According to the Colorado Secretary of State, it is organized under
22 the laws of Colorado and its principal office is in Colorado Springs, Colorado. On information and
23 belief, it is a citizen of Colorado.

24 228. Arizona Water Vendors Inc. (named in the complaint as Arizona Vendors Inc.) is
25 alleged to be a “limited liability company” and to be owned by a Washington resident. According
26 to the Arizona Corporation Commission, Arizona Water Vendors, Inc. is incorporated in Arizona
27 and has its principal office in Everett, Washington. On information and belief, it is a citizen of

1 Washington and Arizona.

2 229. Golden State Vending, LLC is alleged to engage in business activities in Snohomish
3 County. Am. Compl. ¶ 120. According to the Washington Secretary of State, it is organized under
4 the laws of Washington and its principal office is in Everett, Washington. On information and
5 belief, it is a citizen of Washington.

6 230. Refreshing Florida LLC is alleged to engage in business activities in Snohomish
7 County. Am. Compl. ¶ 121. According to the Florida Secretary of State, it is organized under the
8 laws of Florida and its principal office is in Fort Myers, Florida. On information and belief, it is a
9 citizen of Florida.

10 231. Refreshing Midwest, LLC is alleged to engage in business activities in Snohomish
11 County. Am. Compl. ¶ 122. According to the Indiana Secretary of State, it is pending
12 administrative dissolution, but it is organized under the laws of Indiana and it has its principal
13 office in Indianapolis, Indiana. On information and belief, it is a citizen of Indiana.

14 232. Refreshing Midwest Real Estate, LLC is alleged to engage in business activities in
15 Snohomish County. Am. Compl. ¶ 123. According to the Indiana Secretary of State, it is pending
16 administrative dissolution, but it is organized under the laws of Indiana and it has its principal
17 office in Indianapolis, Indiana. On information and belief, it is a citizen of Indiana.

18 233. Refreshing New Mexico, LLC is alleged to engage in business activities in
19 Snohomish County. Am. Compl. ¶ 124. According to the New Mexico Secretary of State, it is
20 organized under the laws of New Mexico and it has its principal office in Albuquerque, New
21 Mexico. On information and belief, it is a citizen of New Mexico.

22 234. Refreshing New England, LLC is alleged to engage in business activities in
23 Snohomish County. Am. Compl. ¶ 125. According to the New Hampshire Secretary of State, it is
24 organized under the laws of New Hampshire and it has its principal office in Manchester, New
25 Hampshire. On information and belief, it is a citizen of New Hampshire.

26 235. Refreshing Texas LLC is alleged to engage in business activities in Snohomish
27 County. Am. Compl. ¶ 126. According to the Texas Secretary of State, it is organized under the

1 laws of Texas and it has an address in Everett, Washington. On information and belief, it is a
2 citizen of Texas and Washington.

3 236. Refreshing Oklahoma LLC is alleged to engage in business activities in Snohomish
4 County and to be owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 127.
5 Public records searches do not reveal its state of organization or principal place of business. On
6 information and belief, it is a citizen of Washington, where Mr. Ryan Wear is domiciled.

7 237. Refreshing Washington, LLC is alleged to engage in business activities in
8 Snohomish County. Am. Compl. ¶ 128. According to the Washington Secretary of State, it is
9 organized under the laws of Washington and it has its principal office in Everett, Washington. On
10 information and belief, it is a citizen of Washington.

11 238. Smart Soda Holdings, Inc. is alleged to do business in Snohomish County,
12 Washington and to be owned by a Washington resident. Am. Compl. ¶ 129. According to the
13 Delaware Secretary of State, it is organized under the laws of Delaware. According to other
14 research, it has an Ohio address. On information and belief, it is a citizen of Delaware and Ohio.

15 239. Vendpro, LLC d/b/a Elitevend is alleged to do business in Snohomish County,
16 Washington and to be owned by a Washington resident. Am. Compl. ¶ 130. According to the
17 Washington Secretary of State, it is organized under the laws of Washington and it has its principal
18 office in Everett, Washington. On information and belief, it is a citizen of Washington.

19 240. Harrison Street, LLC is alleged to engage in business activities in Snohomish
20 County. Am. Compl. ¶ 131. According to the Washington Secretary of State, it is organized under
21 the laws of Washington and it has its principal office in Des Moines, Washington. On information
22 and belief, it is a citizen of Washington.

23 241. 602 South Mean LLC is alleged to do business in Snohomish County and to be
24 owned, operated, and controlled by Defendant Ryan Wear. Am. Compl. ¶ 132. Public record
25 searches do not reveal its state of organization or principal place of business. On information and
26 belief, it is a citizen of Washington, where Mr. Wear is domiciled.

27 242. The complaint makes no allegations about 8825 LLC. According to the Wyoming

1 Secretary of State, it is formed under the laws of Wyoming and it has its principal office in Jackson,
2 Wyoming. On information and belief, it is a citizen of Wyoming.

3 243. Unibank is alleged to be organized in Washington and to engage in business
4 activities in Snohomish County, Washington. Am. Compl. ¶ 134. According to the Washington
5 Secretary of State, Unibank is incorporated in Washington and has its principal office in
6 Lynnwood, Washington. On information and belief, Unibank is a citizen of Washington.

7 244. U & I Financial Corp. is alleged to be organized under the laws of Washington and
8 to engage in business activities in Snohomish County, Washington. Am. Compl. ¶ 134. According
9 to the Washington Secretary of State, U & I is incorporated in Washington and has its principal
10 office in Lynnwood, Washington. On information and belief, U & I is a citizen of Washington.

11 245. Simon Bai is alleged to be a Washington resident. Am. Compl. ¶ 136. Mr. Bai has
12 a Washington address and a vehicle registered in Washington. On information and belief, Mr. Bai
13 is a citizen of Washington.

14 246. Stephanie Yoon is alleged to be a Washington resident. Am. Compl. ¶ 136. Ms.
15 Yoon has a Washington address. On information and belief, Ms. Yoon is a citizen of Washington.

16 247. D. Benjamin Lee is alleged to be a Washington resident. Am. Compl. ¶ 136. Mr.
17 Lee has a Washington address and a vehicle registered in Washington. On information and belief,
18 Mr. Lee is a citizen of Washington.

19 248. Peter Park is alleged to be a Washington resident. Am. Compl. ¶ 136. Mr. Park has
20 a Washington address. On information and belief, Mr. Park is a citizen of Washington.

21 249. First Fed Bank is incorporated in Washington and has its principal office in Port
22 Angeles, Washington. First Fed Bank is a citizen of Washington.

23 250. First Northwest Bancorp, incorrectly named in the caption as First Northwest
24 Bankcorp, is incorporated in Washington and has its principal office in Port Angeles, Washington.
25 It is a citizen of Washington.

26 251. Norman Tonina is a citizen of Washington.

27 252. Craig Curtis is a citizen of Washington.

1 253. Jennifer Zaccardo is a citizen of Washington.

2 254. Cindy Finnie is a citizen of Washington.

3 255. Dana Behar is a citizen of Washington.

4 256. Matthew Deines is a citizen of Washington.

5 257. Sherilyn Anderson is a citizen of Washington.

6 258. Gabriel Galanda is a citizen of Washington.

7 259. Lynn Terwoerds is a citizen of Washington.

8 260. Larry Houk is alleged to be a Washington resident. Am. Compl. ¶ 141. Mr. Houk
9 has a Washington address. On information and belief, Mr. Houk is a citizen of Washington.

10 261. Northwest Financial Services, LLC is alleged to conduct business in Snohomish
11 County and to be owned and operated by Mr. Houk. Am. Compl. ¶ 141. Public records show no
12 entity called Northwest Financial Services, LLC. Public records show Mr. Houk is associated with
13 a company called Northwest Funding Services, LLC. Nevertheless, based on the amended
14 complaint, and on information and belief, Northwest Financial Services, LLC is a Washington
15 citizen.

16 262. Richard Wear is alleged to be a Washington resident. Am. Compl. ¶ 133. Dr. Wear
17 has a Washington address and a license to practice medicine in Washington. On information and
18 belief, Dr. Wear is a citizen of Washington.

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1 DATED this 1st day of August, 2024.

2 LANE POWELL PC

3 By: s/ Gregory R. Fox
4 Gregory R. Fox, WSBA No. 30559
5 foxg@lanepowell.com

6 s/ Andrew G. Yates
7 Andrew G. Yates, WSBA No. 34239
8 yatesa@lanepowell.com

9 s/ Devon J. McCurdy
10 Devon J. McCurdy, WSBA No. 52663
11 mcurdyd@lanepowell.com

12 s/ Dailey Koga
13 Dailey Koga, WSBA No. 58683
14 kogad@lanepowell.com

15 1420 Fifth Avenue, Suite 4200
16 P.O. Box 91302
17 Seattle, Washington 98111-9402
18 Telephone: 206-223-7000

19 *Attorneys for Defendants First Fed Bank, First*
20 *Northwest Bancorp, Norman Tonina, Craig Curtis,*
21 *Jennifer Zaccardo, Cindy Finnie, Dana Behar,*
22 *Matthew Deines, Sherilyn Anderson, Gabriel*
23 *Galanda, and Lynn Terwoerds*

CERTIFICATE OF SERVICE

I, Kathryn M. Savaria, hereby certify under penalty of perjury of the laws of the State of Washington that on the 1st day of August, 2024, I caused to be served a copy of the foregoing **NOTICE OF REMOVAL** via U.S. Mail and electronic mail, on the following person(s) at the following address(es):

Pacific Water Technology v. Ryan Wear, et al. Case No. 24-2--2887-31

Amit D. Ranade, WSBA No. 34878 Rachael E. Clark, WSBA No. 57277 Snell & Wilmer L.L.P. 600 University St, Suite 310 Seattle, WA 98101 aranade@swlaw.com reclark@swlaw.com Attorneys for Proposed Receiver TurningPointe, LLC d/b/a Turning Point Strategic Advisors	David R. Ebel, WSBA No. 28853 Allen R. Benson, WSBA No. 51137 Schwabe, Williamson & Wyatt, P.C. 1420 5th Avenue, Suite 3400 Seattle, WA 98101 Phone: 206-622-1711 Fax: 206-292-0460 debel@schwabe.com ; abenson@schwabe.com Attorneys for Defendants Larry Houk and Northwest Funding Services LLC
Joel Ard, WSBA No. 40104 Ard Law Group PLLC P.O. Box 11633 Bainbridge Island, WA 98110-5633 joel@ard.law Attorney for Defendants Kevin Nooney and Elizabeth Nooney	

John T. Bender, WSBA No. 49658
 Kristen Barnhart, WSBA No. 51135
 Corr Cronin LLP

1015 Second Ave, Floor 10
 Seattle, WA 98104

jbender@correronin.com

kbarnhart@correronin.com

Attorneys for All Plaintiffs:

Pacific Water Technology, LLC
 Spruce Waters Investments, LLC
 Indiana Water Technology, LLC
 AR Water Supply, LLC
 BLC Water Company, LLC
 Granite Street Ventures, LLC
 Rumson Wellness, LLC
 Brown Family Enterprises, LLC
 Kmandy Investments, LLC
 Ever Upward, Inc.
 Sun A Wy, LLC
 Siripi WST, LLC
 Livingwater Station, LLC
 Grayfin Ventures, LLC
 Prasiti Water Investments, LLC
 JBF Consulting Services, LLC
 Coco Aqua, LLC
 Q & V LLC, WaterStation Technology of
 Rockville
 Arravend, LLC
 Flatlands Equipment, LLC
 C&C Investment Holdings, LLC
 Great Oak Water, Limited Liability Company
 WV Water Tech, LLC
 Kdawg Crypto, LLC
 Culminate Water Technology, LLC
 Chaurishi Retail Enterprises, LLC
 Progressive Partners, LLC
 210 SA Holding, LLC
 WST Utah LLC
 V2S2, LLC
 Cyborg Holdings, LLC
 Ash Vending, LLC
 Adventure Done Right, LLC
 Big Boy Tools LLC
 Roman Jarosiewicz

Aimee S. Willig, WSBA #22859
 Armand J. Kornfeld, WSBA #17214
 Bush Kornfeld LLP

601 Union St, Suite 5000
 Seattle, Washington 98101-2373

(206) 292-2110

jkornfeld@bskd.com

awillig@bskd.com

Attorneys for Plaintiffs:

Pacific Water Technology, LLC
 Spruce Waters Investments, LLC
 Indiana Water Technology, LLC
 AR Water Supply, LLC
 BLC Water Company, LLC
 Granite Street Ventures, LLC
 Rumson Wellness, LLC
 Brown Family Enterprises, LLC
 Kmandy Investments, LLC
 Ever Upward, Inc.
 Sun A Wy, LLC
 Siripi WST, LLC
 Livingwater Station, LLC
 Grayfin Ventures, LLC
 Prasiti Water Investments, LLC
 JBF Consulting Services, LLC
 Coco Aqua, LLC
 Q & V LLC, WaterStation Technology of
 Rockville
 Arravend, LLC
 Flatlands Equipment, LLC
 C&C Investment Holdings, LLC
 Great Oak Water, Limited Liability Company
 WV Water Tech, LLC
 Kdawg Crypto, LLC
 Culminate Water Technology, LLC
 Chaurishi Retail Enterprises, LLC
 Progressive Partners LLC
 210 SA Holding, LLC
 WST Utah LLC
 V2S2, LLC
 Cyborg Holdings, LLC
 Ash Vending, LLC
 Adventure Done Right, LLC
 Big Boy Tools LLC

1	Abby Wyatt Group, Inc.	Roman Jarosiewicz
2	Aiden Waterworks, LLC	Abby Wyatt Group, Inc.
3	Horeb Water Solutions, LLC	Aiden Waterworks, LLC
4	Silver Oak H2O, LLC	Horeb Water Solutions, LLC
5	NS SQ ECO Waters, LLC	Silver Oak H2O, LLC
6	JK Seven LLC	NS SQ ECO Waters, LLC
7	Jeffrey Brooke	JK Seven LLC
8	Oed Properties LLC	Jeffrey Brooke
9	JLE Enterprises, LLC	Oed Properties LLC
10	Be of Service, LLC	JLE Enterprises, LLC
11	Etania, LLC	Be of Service, LLC
12	Nira Enterprises, LLC	Etania, LLC
13	Facts Property Services, LLC	Nira Enterprises, LLC
14	IMLSunshine, LLC	Facts Property Services, LLC
15	Redwaters, LLC	IMLSunshine, LLC
16	Starter Holdings, LLC	Redwaters, LLC
17	Helmut Giewat	Starter Holdings, LLC
18	May Auerbach	Helmut Giewat
19	Royal Reservoirs, LLC	May Auerbach
20	Aqualux Water, LLC	Royal Reservoirs, LLC
21	RCWSTECH1157, LLC	Aqualux Water LLC
22	COLEWSTECH, LLC	RCWSTECH1157, LLC
23	Maji 8377, LLC	COLEWSTECH, LLC
24	Oaks Waterstation Tech, LLC	Maji 8377, LLC
25	SDB H2O, LLC	Oaks Waterstation Tech, LLC
26	Half Full Vending, LLC	SDB H2O, LLC
27	RDWSTECH3594, LLC	Half Full Vending, LLC
	Rose Trail Ventures, LLC	RDWSTECH3594, LLC
	Rose Trail Ventures 2, LLC	Rose Trail Ventures, LLC
	Pravin Thakkar Jr.	Rose Trail Ventures 2, LLC
	Kwansoo Lee, DDS	Pravin Thakkar Jr.
	Tom Anderson	Kwansoo Lee, DDS
	Abbey Anderson	Tom Anderson
	Brian Chu, DDS	Abbey Anderson
	Larina Chu	Brian Chu, DDS
	David Schroeder	Larina Chu
	Sarah Schroeder	David Schroeder
	Reginald Franklin	Sarah Schroeder
	Angel Franklin	Reginald Franklin
	Dylan Ross	Angel Franklin
	Taylor Ross	Dylan Ross
	Cody Bishop	Taylor Ross
	David Brown	Cody Bishop
	Karthika Mandyam	David Brown
	David Beranek	Karthika Mandyam

1	Susan Pinkerton	David Beranek
2	Radhika Siripireddy	Susan Pinkerton
3	Karl Schoenleber	Radhika Siripireddy
	James Sartain	Karl Schoenleber
4	Nirupa Keskar	James Sartain
	John Flack	Nirupa Keskar
5	Trung Nguyen	John Flack
	Li Liang	Trung Nguyen
6	Tan Quan Nguyen	Li Liang
	Ashoka Sheanh	Tan Quan Nguyen
7	Mathew Fellows	Ashoka Sheanh
	Charles Coggins	Mathew Fellows
8	Thomas Wawersich	Charles Coggins
	Jason Blough	Thomas Wawersich
9	Michele Blough	Jason Blough
10	Karen Lavin	Michele Blough
	Padma Kandikonda	Karen Lavin
11	Pavan Kandikonda	Padma Kandikonda
	James Vilt II	Pavan Kandikonda
12	Basant Kumar	James Vilt II
	Radhika Kamalla	Basant Kumar
13	Marc Hildebrand	Radhika Kamalla
	Debra Hildebrand	Marc Hildebrand
14	Merrill Stoddard	Debra Hildebrand
	Danielle Stoddard	Merrill Stoddard
15	Venkita Sharma	Danielle Stoddard
	Timothy Dailey	Venkita Sharma
16	Robert Hoery	Timothy Dailey
	Stefani Hoery	Robert Hoery
17	Sean Done	Stefani Hoery
	Anna Done	Sean Done
18	Sterling Davis	Anna Done
	Mark Fleming	Sterling Davis
19	Stacey Fleming	Mark Fleming
	Bo Yang	Stacey Fleming
20	Steven Wells	Bo Yang
	Dustin Braeger	Steven Wells
21	Navaneeth Kumar	Dustin Braeger
	William White	Navaneeth Kumar
22	Jeannette White	William White
	Jeffrey Brooke	Jeannette White
23	Joshua Oed	Jeffrey Brooke
	James Estes	Joshua Oed
24	Adria Estes	James Estes
	Michael Bailey	Adria Estes

Karthiga Jayaram	Michael Bailey
Karthikeyan Ramprasath	Karthiga Jayaram
Archan Tilkoti	Karthikeyan Ramprasath
Aashish Parekh	Archan Tilkoti
Jacob Letourneau	Aashish Parekh
Karla Letourneau	Jacob Letourneau
Konda Reddy Gadi	Karla Letourneau
Sreelakshmi Siripuram	Konda Reddy Gadi
Joshua Leykam	Sreelakshmi Siripuram
Paige Leykam	Joshua Leykam
Deren Flesher, DDS	Paige Leykam
Gary Young	Deren Flesher, DDS
Heidi Young	Gary Young
Ronald Cole, DDS	Heidi Young
James Walker, DDS	Ronald Cole, DDS
Duane Okamoto	James Walker, DDS
Linda Okamoto	Duane Okamoto
Scott Burau, DDS	Linda Okamoto
Brad Burau, DDS	Scott Burau, DDS
Josh McNary	Brad Burau, DDS
Robert Dost, DDS	Josh McNary
	Robert Dost, DDS

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 Second Avenue, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com

Attorneys for Defendants:

Ryan R. Wear
 Rebecca A. Swain
 Creative Technologies, LLC d/b/a Waterstation
 Technology
 WST Franchise Systems, LLC
 Water Station Management, LLC
 Refreshing USA, LLC
 Summit Management Services, LLC
 Ideal Property Investments, LLC
 Refreshing California LLC
 Refreshing Montana, LLC
 Refreshing Mid-Atlantic, LLC
 Refreshing Carolines, LLC
 Refreshing Great Lakes, LLC
 Waterstation Finance Company, LLC
 Refreshing Georgia, LLC
 Creative Technologies Florida, LLC
 Refreshing Florida, LLC
 2129 Andrea Lane LLC
 3209 Van Buren LLC
 Ice & Water Vendors, LLC
 Ideal Industrial Park, LLC
 Ideal AZ Property Investments, LLC
 K-2 Acquisition, LLC
 Emery Development, LLC
 Arizona Water Vendors Incorporated
 WST AZ Properties LLC
 1118 Virginia Avenue LLC
 11519 South Petropark LLC
 TCR Plumbing, LLC
 3422 W Clarendon Ave LLC
 1206 Hewitt Ave LLC
 Waterstation Technology II, LLC
 Pistol, Inc.
 Smokey Point Holdings, LLC
 602 South Meadow, LLC

Nathan Riordan, WSBA No. 33926
 Wenokur Riordan PLLC
 600 Stewart St, Suite 1300
 Seattle, WA 98101-1255
nate@wrlawgroup.com

Attorneys for Defendants:

Creative Technologies, LLC d/b/a Waterstation
 Technology
 WST Franchise Systems, LLC
 Water Station Management, LLC
 Refreshing USA, LLC
 Summit Management Services, LLC
 Ideal Property Investments, LLC
 Refreshing California LLC
 Refreshing Montana LLC
 Refreshing Mid-Atlantic, LLC
 Refreshing Carolines, LLC
 Refreshing Great Lakes, LLC
 Waterstation Finance Company, LLC
 Refreshing Georgia, LLC
 Creative Technologies Florida, LLC
 Refreshing Florida, LLC
 2129 Andrea Lane LLC
 3209 Van Buren LLC
 Ice & Water Vendors, LLC
 Ideal Industrial Park, LLC
 Ideal AZ Property Investments, LLC
 K-2 Acquisition, LLC
 Emery Development, LLC
 Arizona Water Vendors Incorporated
 WST AZ Properties LLC
 1118 Virginia Avenue LLC
 11519 South Petropark LLC
 TCR Plumbing, LLC
 3422 W Clarendon Ave LLC
 1206 Hewitt Ave LLC
 Waterstation Technology II, LLC
 Pistol, Inc.
 Smokey Point Holdings, LLC
 602 South Meadow, LLC

Pure Water Vending LLC v. Water Station Management, No 24-2-00583-31

Alan Schuchman
 Cairncross & Hempelmann
 524 Second Avenue, Suite 500
 Seattle, WA 98104-2323
ASchuchman@Cairncross.com
Attorneys for Plaintiff Pure Water Vending

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants:
 Water Station Management
 WST Franchise Systems
 Ryan Wear

Rex Ventures, LLC v. WST Franchise System LLC, No. 24-2-01438-31

Alex Thomas Larkin, WSBA No. 36613
 Unsa Manzoor, WSBA No. 60440
 MDK Law
 777 108th Ave NE, Suite 2000
 Bellevue, Washington 98004
alarkin@mdklaw.com
umanzoor@mdklaw.com
Attorneys for Plaintiff Rex Ventures LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants:
 WST Franchise System
 Water Station Management
 Ryan Wear

JRC Real Estate III, LLC v. Water Stations Management, No. 23-2-08864-31

Andrew R. Escobar, WSBA No. 42793
 Seyfarth Shaw LLP
 999 Third Avenue, Suite 4700
 Seattle, Washington 98104-4041
aescobar@seyfarth.com
Attorneys for Plaintiff

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendant
 Water Stations Management

Wakanda Ventures, LLC v. Water Station Management, No. 24-2-02919-31

Kristin Nealy Meier
 Ryan Swanson & Cleveland PLLC
 401 Union Street, Suite 1500
 Seattle, WA 98101
kmeier@ryanlaw.com
Attorneys for Plaintiff Wakanda Ventures LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendant
 Water Station Management
 Ryan Wear

James Group Int., LLC v. Water Station Management, No. 23-2-07449-31

Paul A. Barrera, WSBA No. 51990
 Clare E. Bogdanowicz, WSBA No 48927
 NORTH CITY LAW, PC
 17713 15th Ave., Ste 101
 Shoreline, WA 98155-3839
paul@northcitylaw.com
clare@northcitylaw.com
lisalou@northcitylaw.com
Attorneys for Plaintiff James Group Int., LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants:
 Water Station Management
 Creative Technologies
 Ryan Wear

Axial Tilt, LLC, et al. v. Waterstation, LLC; No. 23-2-08829-31

John A. Bender, WSBA No. 19540
 Bender Law
 4634 East Marginal Way S, Suite C-150
 Seattle, WA 98134
john@bender-law.com
Attorneys for Plaintiffs Axial Tilt and Mod
 Holdings LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants:
 Water Station LLC
 Ryan Wear

Emmatoine LLC v. Water Station Management, No. 24-2-01283-31

Manish Borde
 Borde Law PLLC
 1700 Seventh Avenue, Suite 2100
 Seattle, WA 98101
mborde@bordelaw.com
Attorneys for Plaintiff Emmatoine LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendant
 Water Station Management

Rhino Manufacturing, et al. v. Creative Technologies, No. 24-2-01362-31

Todd J. Cook, WSBA # 44729
 Dexter N. Bradford, WSBA # 59849
 Beresford Booth PLLC
 145 Third Avenue South, Suite 200
 Edmonds, WA 98020
toddc@beresfordlaw.com
dexterb@beresfordlaw.com
Attorneys for Plaintiffs
 Rhino Manufacturing Inc.
 Rhino Investments LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants:
 Waterstation Management
 Creative Technologies

Paul Martinchuk v. Waterstation, LLC; No. 24-2-03489-31

Kyle D. Netterfield, WSBA No. 27101
 Abigail St. Hilaire, WSBA No. 48194
 Ellis Li & McKinstry PLLC
 1700 Seventh Ave Ste 1810
 Seattle, WA 98101
 (206) 682-0565
knetterfield@elmlaw.com
asthilaire@elmlaw.com
Attorneys for Plaintiff Paul Martinchuk

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants
 Water Station Management
 WST Franchise System
 Creative Technologies
 Ryan Wear
 Rebecca Swain

Joel Ard, WSBA No. 40104
 Ard Law Group PLLC
 P.O. Box 11633
 Bainbridge Island, WA 98110-5633
joel@ard.law
Attorneys for Defendants Kevin Nooney and Elizabeth Nooney

Dennis Demirjian v. Water Station Management et al.; No. 24-2-02346-31

Samuel E. Baker, Jr., WSBA #3872
 Trevor H. Lane, WSBA # 55739
 Smith Currie Oles LLP
 600 University Street, Suite 1800
 Seattle, WA 98101
sebaker@smithcurrie.com
thlane@smithcurrie.com
Attorneys for Plaintiff Dennis Demirjian

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants:
 Water Station Management
 Creative Technologies
 Refreshing USA LLC
 Ideal Property Investments
 Summit Management Services LLC
 Ryan Wear

Joel Ard, WSBA No. 40104
 Ard Law Group PLLC
 P.O. Box 11633
 Bainbridge Island, WA 98110-5633
joel@ard.law
Attorneys for Defendant Kevin Nooney

Tanushka Water Vending v. Ryan Wear, et al.; Case No. 24-2-02684-31

Eric J. Harrison, WSBA # 46129
 5400 California Ave. SW, Suite E
 Seattle, WA 98136
eric@attorneywestseattle.com
Attorneys for Plaintiffs
 Tanushka Water Vending LLC
 Aarana Water Vending LLC

Patrick L. Vail, WSBA No. 34513
 Patrick L. Vail, PLLC
 1000 2nd Ave, Suite 1770
 Seattle, WA 98104
pvail@pvaillaw.com
Attorneys for Defendants
 Ryan Wear
 Water Station Management

DATED this 1st day of August, 2024.

s/Kathryn Savaria
 Kathryn Savaria